



26 July 2007

Secretary Ian A. Bowles
Executive Office of Energy and
Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114
Att: MEPA Office

RE: EOE #8161/ 14045
Boston Cargo Terminal, Boston

Dear Secretary Bowles:

The Boston Harbor Association, a non-profit, public interest organization founded in 1973 by the League of Women Voters and the Boston Shipping Association to promote a clean, alive, and accessible Boston Harbor, has reviewed the Environmental Notification Form for Boston Cargo Terminal, proposed in the Boston Marine Industrial Park located in the South Boston Designated Port Area (DPA).

The proponent, Marine Terminal Development LLC, proposes to construct three buildings on 25 acres of the site for an intermodal marine industrial facility that will support different types of cargo brought in by ocean, air, truck and/or rail. Besides freight forwarders and logistics companies, the buildings will house seafood processors, bulk and break-bulk cargo such as wood products, and temperature-controlled facilities for seafood and other perishable goods.

A bulk cargo cement operator will be located on the remaining 4.3 acres of the site. The bulk cement distribution operation will receive cement via water, store, and then transfer the cement to other locations by truck or barge. A truck-loading

cement silo of 125 feet high, with a dust collector on top, will be built on site.

The Boston Harbor Association has reviewed the proposed project and believes that the proposed usage is highly consistent with the Boston Marine Industrial Park Master Plan and with the Department of Environmental Protection's Master License for the site. Moreover, the proposed uses are consistent with the zoning requirements for the South Boston Maritime Economy Reserve Subdistrict (MER zone) and for a Designated Port Area.

The project is a maritime industrial use and includes water-dependent industrial uses. The Boston Harbor Association strongly supports this project, bearing in the mind the following issues as the project moves through environmental permitting:

Transportation Impacts: Section 3 of the Environmental Notification Form notes that the warehousing component of the project will generate 1,226 daily truck trips, and the cement operation will generate an additional 320 truck trips, for a total of 1,546 truck trips daily, or 1,146 new daily truck trips over the current 400 daily truck trips.

It is not clear how pedestrians, particularly the employees who will work at this site, and employee cyclists who will be using the bike rack within Building A, can safely access the site, given the large number of tractor trailers and cement trucks entering and leaving each day. Pedestrians who use the Silver Line Waterfront line will get off at the Northern Avenue and Tide Street stop, and walk along the south side of Fid Kennedy Avenue. The Environmental Notification Form notes (page 3-19), "Although currently publicly accessible, the site lacks the necessary infrastructure and improvements to ensure the safety of pedestrians entering the site." Additional information is needed on how employees can safely access the site by foot and bike, and how conflicts with tractor trailers and cement trucks can be avoided.

Second, Boston Mayor Thomas M. Menino has publicly stated his desire to move City Hall to Wharf 8/ Dry Dock 4 in the Boston Marine Industrial Park, less than a quarter mile from this proposed project. If that occurs, significant numbers of additional pedestrians can be expected in the immediate area, and we urge further analysis of measures that can be initiated to minimize conflicts between these additional pedestrians and tractor trailers and other trucks.

Third, we urge a more pro-active approach by all parties to reinstatement of rail service in the Marine Industrial Park to support the growth of the Port of Boston. Section 2.3.3 of the ENF notes that the project proponent is "committed (and required by Massport) to preserve future potential rail access to and onto the site and will work with the City and Massport to market the site to prospective tenants who could potentially utilize the future rail service" (page 2-19). While a start, we strongly urge more pro-active planning and analysis by the City of Boston and Massport with the project proponent regarding the extension of Track 61 from its current alignment along Dry Dock Avenue to this site and others in the Marine Industrial Park.

Public Access: We commend the project proponent for providing point access to this site for the general public. Section 3.11.3 and Figure 3-4 show a well-situated harbor viewing area at the westerly end of the site away from the warehouse buildings and cement facility where trucks enter and leave, thereby creating a safe area for the public to view the Working Port and the adjacent displays at Legal Sea Foods' corporate headquarters.

To make this viewing area even more usable, we urge the project proponent to re-evaluate the number of parking spaces actually needed for employees and visitors, and to consider enlarging the viewing area and open space by eliminating excessive parking spaces. Two hundred and eighty parking spaces are proposed, while the ENF indicates eight employees at the cement facility and an unspecified number of employees in the three seafood processing and warehouse buildings. Experience with other seafood processors in the South Boston DPA (such as at the Fish

Pier, North Coast Sea Food, and others in the Marine Industrial Park) indicates that a majority of seafood processing employees are highly dependent upon mass transit and not likely to drive to their jobs.

Mayor Menino and the staff of the Economic and Development Corporation which operates the Boston Marine Industrial Park have done an excellent job of balancing growth in maritime jobs with public access to the Working Port. Mayor Menino dedicated the Brian R. Skerry Memorial Park in September, 2002 immediately adjacent to Dry Dock 3 where Boston Ship Repair Company repairs naval vessels and ocean-going cruise vessels. The small park, with an ADA-compliant viewing ramp, seating, and tables, honors the memory of Brian Skerry, a South Boston Vietnam-era veteran and shipyard worker who belonged to Shipbuilders Local 25.

The new viewing area to be developed by the project proponent, together with the Brian R. Skerry Memorial Park, the award-winning park next to Coastal Cement Corporation at 36 Dry Dock Avenue, and the viewing area at 88 Black Falcon Avenue, will create a network of public access points within the Boston Marine Industrial Park which will further enhance public awareness and appreciation of Boston's Working Port.

Other Maritime Uses: The North Jetty portion of this site has been used in recent years for Tall Ships berthing and for such vessels as the John F. Kennedy Carrier because of its deep water berth. We strongly urge that the project proponent make provisions to allow for use of the site during special public events such as the Tall Ships. Unfortunately, there are fewer and fewer places along Boston Harbor where berthing is available for large vessels participating in special public events.

Sustainable Working Port: The Boston Harbor Association is committed to working with waterfront proponents on sustainable development, consistent with Governor Patrick and Mayor Menino's strong advocacy for "green" development. We commend the project proponent for his commitment to sustainable design and potentially gold LEED certification, with an emphasis on energy efficiency, alternative energy sources such as solar power,

landscaping features which eliminate the need for permanent irrigation, and recycling.

We further commend the project proponent for installation of what will be the first stormwater management system on site to help improve and maintain sound water quality in Boston Harbor.

We look forward to the timely approval of this project. Thank you for your consideration of our comments.

Sincerely,

Vivien Li
Executive Director