



September 22, 2015

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Matthew Beaton, Secretary
Massachusetts Executive Office of Energy and Environmental Affairs
Attention: MEPA Office
Anne Canaday, EEA # 15410
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: Woods Hole Ferry Terminal Reconstruction Project Environmental Notification Form

Dear Secretary Beaton:

The Association to Preserve Cape Cod (APCC) is the Cape's leading nonprofit environmental advocacy and education organization. Founded in 1968 and today representing over 5,000 members across the region, APCC's mission is to preserve, protect and enhance the natural resources of Cape Cod. APCC has reviewed the Woods Hole Ferry Terminal Reconstruction Project Environmental Notification Form (ENF) and offers the following comments.

According to the ENF, the Woods Hole, Martha's Vineyard and Nantucket Steamship Authority (SSA) proposes to reconstruct its Woods Hole ferry terminal and to construct a new administration building at the site of its passenger parking facilities at Palmer Ave. in Falmouth. Among other elements, the project includes demolition of the existing terminal/administration building, excavation of a large section of the existing pier, reconstruction and modernization of all three existing ferry slips including vessel sewage pump-out facilities, construction of a new terminal building, a reduction in the number of parking spaces at the terminal site and the Palmer Ave. site, and construction of a new administration building at the Palmer Ave. site.

Potential Impacts from Increased Capacity: As indicated above, the ENF proposes to reconstruct all three ferry slips so that they are each fully operational and capable of performing all ferry service functions, compared to existing conditions where two slips are set up for that purpose and the third is used for ferry berthing and repairs. The ENF emphatically and repeatedly states that there are no plans to increase ferry service or operations at the Woods Hole terminal. The SSA maintains that in proposing this project, it intends to use only two slips for operational purposes at the same time, but updating all three gives the SSA the flexibility to alternate slip use when necessary. The ENF contends that the limited number of parking spaces at the terminal site, coupled with the fact that the two slips currently in active use are already capable of accommodating additional ferry trips, is proof that increasing ferry service is not the intent behind the proposed upgrades.

The ENF states that there should be no increase in Woods Hole traffic, and instead estimates there would be a net reduction in Woods Hole traffic of 200 fewer trips per day, due to the relocation of the administration building to Palmer Ave. However, the ENF also states there could be a need for additional parking capacity due to reduction of parking spaces at the

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terminal site and at the Palmer Ave. lot, even with the addition of the new 1,922-space parking lot on Technology Park Drive that opened in June, 2015. The ENF suggests that there is potential for more parking capacity to be added in the future to the Palmer Ave. site or to another unidentified location. APCC recommends that the Environmental Impact Report (EIR) identify the anticipated future demand for parking, show whether the project as proposed will or will not accommodate that anticipated parking demand, and identify specific locations where additional parking will be supplied if a need is determined.

Despite assurances to the contrary by the SSA in the ENF, APCC is aware of concern within the greater community that upgrading the operational function of all three Woods Hole terminal slips will open up the potential for greater intensity of use of the ferry service in the future.

The ENF does acknowledge that the proposed project will theoretically increase the SSA's operating capacity, even though the two operating slips are not currently used to their full capacity. Although the ENF states that current trends do not indicate a substantial increase in demand that would require use of all three slips at the same time, it does state that "if and when" there is an increase in ferry service demand, the SSA "can be expected to respond to that demand by managing, reducing and mitigating" traffic impacts.

In discussing why increases in ferry-related traffic are not anticipated in the near future, the ENF states that the significant percentage of the growth in passenger and vehicle numbers over the years has occurred in the off-season, when overall traffic in the surrounding community is less of an impact. However, the table on page 145 of the ENF shows a month-by-month breakdown of vehicle trips from 1990 to present, which reveals a general upward trend in the number of vehicles using the service in the July and August peak summer months. In July and August of 1990, total vehicle numbers were 45,565 and 50,406, respectively, and in 2014 for July and August, total numbers were 61,113 and 62,457, respectively, with slight up or down fluctuations from year to year. The table on page 135 shows the total number of passengers in 1990 was 272,585 in July and 308,055 in August, and increased in 2014 to 349,545 in July and 377,739 in August. In both cases, the data provided in the ENF show a steady increase in ferry use during the peak summer months.

The proposed expansion of terminal slip operation capabilities in the ENF suggests the need for a comprehensive study of the upper Cape region's (and especially Woods Hole's) existing infrastructure capacity and its ability to sustain a potential future expansion of ferry service. It would also be advantageous for the public to know in greater detail the SSA's long-range operation and growth plan for ferry service to Martha's Vineyard from Woods Hole and other potential locations, and how the proposed terminal reconstruction project fits into those plans.

Impacts to Habitat: The ENF states that an area estimated as something less than 2,000 sf of eelgrass beds will be impacted from proposed dredging for the terminal project. Surveys conducted to determine the extent of eelgrass beds in that location documented moderate to heavy population densities of eelgrass. APCC recommends that the EIR provide a detailed study of alternatives that would avoid impacts to the eelgrass. If it is determined that impacts cannot be avoided, the EIR should discuss proposals for minimizing and mitigating impacts to the eelgrass beds.

According to the ENF, dredging and slip reconstruction will take place within area mapped as Estimated and Priority Habitat of state-listed rare species. At the time of the ENF's publication, the specific rare species mapped for this location were unknown to the SSA. APCC recommends that information about

the mapped species be provided in the EIR, as well as a determination from the Massachusetts Natural Heritage and Endangered Species Program (NHESP) regarding the likelihood that mapped species will be impacted by the project. If a determination is made by NHESP that the project as proposed will result in a species “take,” the EIR should include discussion of project modifications to avoid a take. If impacts are unavoidable, the EIR should include a proposed plan to minimize and mitigate project impacts to mapped species.

Portions of the existing Palmer Ave. parking lot are within mapped Priority and Estimated Habitat for rare species, according to map EC-1 in the ENF. The EIR should confirm whether any development activity will occur within the mapped portions of the parking lot.

Wastewater: According to the ENF, the Woods Hole terminal site will be connected to sewer, but a conventional Title 5 septic system is proposed for the new administration building at the Palmer Ave. parking lot site. APCC recommends that the EIR discuss potential wastewater impacts to impaired water resources resulting from this project, especially regarding a determination whether the project meets regionally accepted nitrogen loading standards.

Stormwater: The ENF states that the Woods Hole terminal reconstruction project and the Palmer Ave. administration building development project will both include adequate stormwater management. APCC recommends that the EIR provide more specific details about the project’s stormwater management plans. The discussion should include whether Low Impact Development (LID) techniques will be utilized in the stormwater management plan, especially for the Palmer Ave. site where there may be more opportunity for LID to be used.

Hazardous Materials: The ENF states that soil contaminated with 2-metylnaphthalene and arsenic at the terminal site will be removed during reconstruction of the pier. APCC recommends that the EIR explain how the contaminated soil will be disposed of, and where it will be disposed.

Climate Change Preparedness: APCC is pleased to see that the ENF describes specific design features in the proposed terminal reconstruction project that are included in order to address sea level rise predictions for the northeast, based on the anticipated 50-year life of the project. Such planning will help ensure that our coastal infrastructure is resilient to changing sea levels and other impacts from climate change.

APCC thanks the Secretary for the opportunity to provide written comments on this development project, which has significant implications for the future of regional transportation on Cape Cod and the Islands. APCC looks forward to reviewing the EIR when it is released.

Sincerely,



Don Keeran
Assistant Director

cc: Cape Cod Commission