January 09, 2019

RE: Mass DOT’S proposal for the Chelsea Street Bridge Temporary test deviation from current bridge operating schedule (IAW 33 CFR 117.593) to restriction on openings during specified hours.

Captain Eric Doucette
Commanding Officer, Sector Boston
427 Commercial Street
Boston, MA 02109

Dear Captain Doucette,

During a quarterly meeting held on January 9, 2019, the Massachusetts Bay Harbor Safety Committee did discuss the referenced Mass DOT proposal.

After hearing the concerns of the committee, we care to inform you that the Massachusetts Bay Harbor Safety Committee firmly opposes this proposal.

The Massachusetts Bay Harbor Safety Committee (MBHSC) is an advisory committee to the U.S. Coast Guard. The MBHSC is comprised of public officials and private parties whose vital interests are in assuring safe navigation to protect the environment, property, and personnel on the waterways of Massachusetts Bay, from Gloucester to Plymouth. The MBHSC accomplishes its mission by disseminating, adopting or developing appropriate standards and best practices that address operational elements regarding maritime operations unique to the region and may advise regulatory bodies as well as seek action by those non-regulatory entities to achieve a resolution of concern and enhance safety.

Our meeting was well attended by professionals who have taken part in meetings with Mass DOT, industry leaders in the POB, regulatory bodies, safety officials, first responders, and service providers. Discussing solely the maritime component of this proposal, operational hours will compromise safety and introduce complex situations. To impose upon the maritime sector both commercial and recreational, such burdens and unknowing situations is unsafe.

Tides, unpredictable weather, lack of docking facilities, vessel size, and water depths are just a few factors that dictate safe passage through Chelsea Creek. Furthermore, passage for larger vessels is already limited where transit is restricted to daylight hours. One cannot simply
adjust these factors so as to accommodate a bridge opening during car or bus commuter-compatible schedules across the Chelsea Street Bridge. Even after recent dredging and the redesign of the bridge, depths and widths are still a challenge for globally sized vessels that New England relies on for fuel and other products. It is not a matter of economic preference when vessels enter and exit this waterway; it is a matter of safety.

MBHSC has no role in economic decision making. Our work is maritime safety. If at time's vessels (recreational or commercial) can use the waterway are restricted due to a commuter schedule, the pressure to complete necessary vessel transits or respond to an incident could result in instances where unsafe conditions, which were avoidable, now become inevitable.

The MBHSC recognizes that the overwhelming majority of the public is generally unaware of and unconcerned by why or how vessels transit the world never mind through Boston Harbor and into Chelsea Creek. It is not our mission to address Mass Transit. At a recent POG meeting, it was encouraging to hear Mass DOT express that they have two (2) other options besides bridge hours to alleviate commuter traffic. Unfortunately neither was made public. We encourage Mass DOT to pursue those options.

As an advisory committee to the U.S. Coast Guard, where we share the vital interests of assuring safe navigation to protect the environment, property, and personnel on the waterways, the Massachusetts Bay Harbor Safety Committee is standing by to discuss all elements of concern regarding this proposal.

Best regards,

Capt. Angel Montanez, Chairman
Massachusetts Bay Harbor Safety Committee
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