



Woods Hole, Martha's Vineyard and Nantucket Steamship Authority

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Report Issued under Section 15A of the Authority's Enabling Act
on the Proposed 2023 Summer Operating Schedules of the
Woods Hole, Martha's Vineyard and Nantucket Steamship Authority

Introduction

Section 15A of the Enabling Act of the Woods Hole, Martha's Vineyard and Nantucket Steamship Authority ("the Authority") requires the Authority to post and advertise in newspapers with general circulation in Falmouth, Barnstable, Martha's Vineyard, Nantucket and New Bedford all of its proposed schedule changes at least sixty (60) days prior to their effective date. St. 1960, c. 701, §15A. Accordingly, the Authority placed advertisements of its proposed 2023 Summer and Fall Operating Schedule for Martha's Vineyard and Nantucket Routes in the following newspapers at the end of April 2022:

- *The Cape Cod Times*;
- *The (New Bedford) Standard-Times*;
- *The Inquirer and Mirror*;
- *The Falmouth Enterprise*;
- *Vineyard Gazette*; and
- *The Martha's Vineyard Times*.

The Authority's Enabling Act also provides that, if the Authority receives a petition within thirty (30) days of those advertisements that is signed by not less than fifty (50) persons who are residents of any of those communities requesting a public hearing on the proposed schedule changes, the Authority is to conduct a public hearing within fourteen (14) days of receiving the

petition. On May 31, 2022, the Authority received an email with an attached petition objecting “to the SSA scheduling of the 5:30AM early morning freight from Woods Hole to Martha’s Vineyard and its multiple negative public health impacts on Falmouth and Woods Hole residents caused by pre-dawn noise as well as the ever-increasing threats to public safety resulting from increasing freight truck traffic over Falmouth roads leading to and from Woods Hole.” One hundred and sixty (160) names and addresses were appended to the petition with the majority of the names listing addresses within the Town of Falmouth, a copy of the petition and the list of names and addresses are attached to this report as **Appendix A**. Following its receipt of the petition, the Authority held a public hearing on its proposed schedules via the Zoom videoconferencing platform (due to the COVID-19 pandemic) on June 8, 2022.

The June 8, 2022 Public Hearing on the Proposed Schedules

On June 8, 2022, the Authority conducted a hearing via the Zoom videoconferencing platform concerning its proposed 2023 summer operating schedule between Woods Hole and Martha’s Vineyard. The hearing began at 5:00 P.M. and concluded at approximately 6:20 P.M. Two (2) members of the Authority’s Board, Peter Jeffrey (Falmouth) and Robert Ranney (Nantucket), attended but did not participate at the hearing. Also attending were the Authority’s General Manager Robert B. Davis, its General Counsel Terence G. Kenneally, its Director of Shoreside Operations Alison A. Fletcher, and, serving as the Zoom videoconferencing facilitator and moderator, its Communications Director Sean F. Driscoll. Approximately seventy (70) members of the public were in attendance.

The Authority recorded the hearing, obtained a transcript (**Appendix B**) and compiled the following summary of the testimony provided by fourteen (14) of the participants at the hearing.

1. **Nat Trumbull** (Woods Hole) – Mr. Trumbull said there are multiple negative public health and safety issues that impact Falmouth residents due to the Authority’s schedules. First is the daily pre-dawn noise disturbance of hundreds of Falmouth residents that live along Palmer Avenue, Locust Street, Woods Hole Road, Crane Street and Cowdry Road. He said that the freight trucks race to make the 5:30 a.m. freight ferry every day. He asked if the Authority could provide credible evidence that the 5:30 a.m. freight schedule is not, directly or indirectly, regularly waking up Falmouth residents and creating a public health nuisance and hazard? He said the Authority needs to understand that there are residential homes within fifteen (15) feet of Woods Hole Road. He added that the Authority cannot say that its freight customers are not waking up Falmouth residents on a daily basis, nor can the Authority claim that by limiting the truck length to forty (40) feet on the 5:30 a.m. freight ferry residents will not be woken up. He asked why the Authority has never addressed the topic of public health impacts from sleep disruption in prior section 15A reports and asked that the Authority include an explanation on how it’s reasonable for people living in residential neighborhoods be woken up at 5:00 a.m. and earlier in its next 15A report.

Mr. Trumbull further said that in last year’s section 15A report that the 5:30 a.m. freight ferry carries only a percentage of food trucks and asked why the seven other ferries leaving Woods Hole between the hours of 6:00 a.m. and 8:35 a.m. didn’t have the capacity to transport the

Vineyard food trucks? He said if fewer trucks filled with landscaping material, construction material and trash trucks were scheduled on these later morning trips then there would be no need for a 5:30 a.m. freight trip. Mr. Trumbull said that a daily 5:30 a.m. trip for automobiles and passengers-only would be acceptable to the residents of Falmouth. He asked how the Authority in its section 15A report of this hearing can justify the health impacts of waking hundreds of Falmouth residents on a daily basis at pre-dawn hours solely to meet the commercial interests of shippers on the Vineyard? He said the 56,000 freight trucks that traveled through the community in 2021 were all diesel trucks and there is diesel soot from the trucks in the air and on their windowsills that the residents breathe in daily causing long-term health hazards from prolonged exposure.

In addition to the health hazards, Mr. Trumbull stated that the larger eighteen (18) and twenty (20) wheel trucks are too heavy, and they are unable to stop in time for Falmouth school buses stopping along the route to drop off children. He claimed there are photographs and videos of some of these incidents on the way to the Woods Hole terminal. He also said that he is a member of the Falmouth/Woods Hole Noise and Traffic Working Group and the group has strongly suggested that the Authority ask the State Police to conduct spot weight checks at the Woods Hole and Vineyard Haven terminals. He also stated that the Authority has yet to contact the State Police regarding these checks. Mr. Trumbull added that there are the negative safety impacts of traffic backups along Woods Hole Road in the summer when the approximate 50,000 to 60,000 extra cars travel Woods Hole Road. He said when the road is backed-up emergency vehicles cannot use the main road to enter Woods Hole village despite the Authority's assurance that no such backups would occur. He went on to say that one of the clear sources of the backups is the current standby policy during which the Authority insists that there be standby available on weekdays during the summer. He said the standby system is actively promoted on the Authority's website and causes unpredictable demand at the Woods Hole terminal. He said that the standby policy will remain unchanged from last year and that long backups on Crane Street and Woods Hole Road are expected again. He asked how will this year's section 15A report show that the current SSA standby policy on weekdays is not the source of the backups along these roads? Mr. Trumbull mentioned that Woods Hole Road and other roads in Woods Hole are not the only ones that have chronic traffic congestion, the traffic backups extend all the way up Palmer Avenue near the Falmouth Hospital. He said there is an obvious danger of blocking traffic to and from a busy hospital, including delaying the arrival of ambulances. He asked if the Authority could explain why they think it's reasonable to block or delay entry to Falmouth Hospital?

Mr. Trumbull briefly explained the creation and workings of the Falmouth/Woods Hole Noise and Traffic Working Group. He said that the group has not met since November 2021 and the numerous emails to the dedicated email address are not always answered by the Authority's staff. He asked how the group is expected to work as there is no reliable baseline information on conditions on the routes to the Woods Hole terminal.

Mr. Trumbull concluded his statement by comparing the current Request For Proposals (RFP) for off-Cape service to the RFP issued almost twenty (20) years ago. He said they are nearly identical despite the Authority's conclusion that the New Bedford freight experiment to the Vineyard was a failure following the original RFP and questioned why the Authority expected a different result this time around. Mr. Trumbull's primary criticism of the current RFP is the exclusion of automobiles as a category for freight carriers to move between the off-Cape port and

the Vineyard and could possibly be the deciding factor in making an off-Cape port profitable for a third-party carrier. He also asked why on-demand service for freight is not offered for the third-party carrier and why the evaluation points in the RFP seem like they would be difficult to meet and therefore making the option destined to fail?

2. **Doug Brown** (Falmouth) – Mr. Brown stated that he wanted to remind the Authority that the Falmouth Select Board has sent letters to the Authority for the last three (3) years requesting to cease the 5:30 a.m. trips. He said he thought that there were some good opportunities identified recently to shift the schedule around and he hoped that the Authority would consider the suggestions. He said that he was looking forward to getting freight service out of New Bedford as soon as possible and appreciated the efforts of the Authority in that regard. He said that the Select Board is still requesting the removal of the 5:30 a.m. freight trip from the schedule.

3. **Kat Monterosso** (Martha's Vineyard) – Ms. Monterosso stated that she was listening to NPR after waiting in standby at the Authority and heard that Falmouth residents wanted the Authority to consider banning standby seven days a week during the summer. She said that she had to use standby today due to an emergency vet appointment. She said that she has had to use standby many times in cases of personal or animal emergencies in order to get off-island. She pointed out that the next available return ferry to Martha's Vineyard was on June 19th at 5:30 a.m. and although she empathizes with Falmouth residents regarding the traffic and other concerns, she requested that if standby had to be eliminated that it only be eliminated for non-island residents. She said that there are compromises that need to be made on both sides and accommodations will have to be made by the Authority. She reminded everyone that there are people that live on-island year-round, and they cannot be stranded on the mainland because of the lack of available trips.

4. **Jonathan Goldman** (Woods Hole) – Mr. Goldman supported Mr. Brown and Mr. Trumbull's comments and added that just recently he was woken up early by the sound of freight trucks going by as well as the sound of jake brakes on a daily basis. He said that any way to alleviate the health-related concerns is essential to the health and well-being of both sides of the Sound and would be a demonstration of the Authority's ability to listen and respond to the problem. He said that he is dismayed because it doesn't seem like there has been any formative response by the Authority because they are protected legally. Mr. Goldman said that he does not live directly on Woods Hole Road but said that he can hear the noise from the road all year round. Mr. Goldman remembers having a meeting with the Cape Cod Commission a number of years ago about the Authority's impact on the community and its sustainability and said that nothing ever came of that meeting. He said that the questions that Nat Trumbull has asked are pertinent and need to be answered with fact-driven responses.

5. **Damien Kuffler** (Woods Hole) – Mr. Kuffler stated that there have been many meetings and public hearings over the years that gave the Authority the chance to hear about issues that the public would like to have addressed. He said that instead of constructively addressing the issues raised, the Authority did as it wanted regardless of the public's concerns. He said that the Authority has never fully explained why a 5:30 a.m. freight trip was necessary to run out of Woods Hole despite the public's complaints about health and safety concerns. Mr. Kuffler said that the Authority claims to have personnel routinely monitor traffic for backups onto Woods Hole Road, but the monitoring never resulted in any action to reduce or actually prevent the backups from

happening. He said that the Authority takes no responsibility for the traffic backups along Woods Hole Road and have never alerted the public authorities about the problems in order to rectify the issues. He said that the Authority claims that they are concerned about speeding trucks and air pollution caused by traffic but has not taken any actions to reduce the problem and has been delaying the process of the Noise and Traffic Working Group because it doesn't actually care about resolving the problems. He said the Authority claims that there are no funds to support the mitigation of the problems even though they spend more than \$1 million on needless advertising on its already overbooked services. Mr. Kuffler insists that the money could be spent on resolving most of the issues caused directly by the Authority.

Mr. Kuffler further stated that the Authority promised the public that the third slip at the Woods Hole Terminal would only be used for overnighting and emergencies, not for everyday freight service. He said currently the third slip is being used for daily service. He said the Authority also claims that it is running at full capacity and would be unable to adjust the early morning schedule even though it often runs "unscheduled trips" when it needs to. Mr. Kuffler said that the Authority adds unscheduled trips anytime it wants to and asked who would prevent the Authority from running overnight, 24/7?

Mr. Kuffler mentioned the Woods Hole Terminal reconstruction design and the unnecessary massive ticket office planned which is strongly opposed by the local community. He said the Authority claimed that it could not make more than cosmetic changes to the design thus not taking the opinions of the public into consideration. He said that this is another example of the Authority not acting in good faith or with any sense of a moral compass or social or financial integrity. He concluded by asking when will the Authority stop lying and acting in its own self-interest and listen to the local community?

6. **Edward DeWitt** (Falmouth) – Mr. DeWitt began his statement by introducing himself as a former Falmouth representative of the Steamship Authority and is currently the Chairman of the Falmouth Transportation Committee. He said that the Authority is charged in its Enabling Act to provide adequate transportation of the necessities of life to the islands of Nantucket and Martha's Vineyard. He said that the proposed schedule is far beyond minimally sufficient to accomplish the purpose of the Authority and poses risks to health and safety and is offensive to community standards. Mr. DeWitt noted that there are other reasonable and economically viable solutions and port alternatives, namely New Bedford. Mr. DeWitt said that the necessities of life include food, shelter, medical care and protection from harm- it does not include hauling trash or landscape trailers or tour buses on a daily basis.

Mr. DeWitt said the proposed schedule reinforces that the Authority has created a public nuisance. He said there is a public nuisance complaint filed in January 2022 on behalf of the Southeast Massachusetts Regional Transportation (SMART Citizens Task Force) of which he has submitted a written copy for the record as well as a report from twenty (20) years ago done by the Governor's New Bedford, Cape and Islands Ferry Service Task Force which identifies the suitable schedule in and out of Woods Hole. He said these reports note a commitment by the Authority to reduce cars to 1995 levels but instead the Authority has expanded its schedule to include freight operations, raised vessel carrying capacity and community outrage. Mr. DeWitt said that the

Steamship Authority should live up to the promise they made to the Task Force twenty (20) years ago and operate a schedule that satisfies the purpose of the Authority.

Mr. DeWitt said that in the Section 15A findings the Authority needs to address the following: how the 5:30 a.m. freight boat is necessary to provide the necessities of life to the island and not added for the convenience of truck drivers and why the promise to the New Bedford and Cape and Island's Ferry Service Task Force to limit capacity to 1995 levels was broken and remains broken. He asked that the Authority clearly define their mission to provide adequate transportation for the islands and how having standby for non-island residents fulfills the mission and why it took twenty (20) years to formulate an RFP for Off-Cape freight service for Martha's Vineyard when it only took two (2) months to draft, post and award a license for freight service between New Bedford and Nantucket.

7. **Kristen Alexander** (Falmouth) – Ms. Alexander said that she agreed with Selectman Brown and Mr. Trumbull and added her concern about the dangerous traffic on the streets of Falmouth and Woods Hole on the way to the terminal. She asked if the Authority is going to take responsibility for traffic that comes from their operations and travels through Falmouth. She said that the Authority needs to think about the people in Falmouth, not just the island residents, and how their health and safety is being impacted.

8. **Stephen Laster** (Woods Hole) – Mr. Laster said that this same meeting occurs once every year to discuss the same schedule and that's frustrating. He further claimed that the 15A reports are without data, unsupported by facts and are hard to understand. He mentioned that the vessel hitting the WHOI dock, the use of slip 3 as a danger and a broken promise and the early morning freight trip are proof of mismanagement and that all the mechanical breakdowns and the vessels working at the end of their lifespan doesn't speak for a high quality of service. He opined that the Authority does not have good governance and the hearing should have taken place in person allowing everyone to truly engage in the conversation. Mr. Laster claimed that the mismanagement of funds is another issue the Authority faces- the Authority is building buildings that are unnecessary to deliver the basic service and neglecting to keep up with vessel replacements as needed. He suggested that the funds being used to build the new terminal building could have gone towards solving other issues such as lowering ticket prices and paying employees a fair wage which would then help the Authority fill positions. Mr. Laster further opined that the current track the Authority is on will lead the way to rewriting the Enabling Act and changing the Authority back to the way it was. He said he hoped that Authority will be sure to include the public health risks, the 5:30 a.m. freight trip and the overcrowding of Woods Hole in the next 15A report and hoped this meeting wouldn't have to happen again next year.

9. **Ted Fitzelle** (Woods Hole) – Mr. Fitzelle said that he wanted to reiterate that these schedule hearings have been going on for three (3) years now and even though the Authority management sits there and listens carefully, the decision had already been made to continue with the 5:30 a.m. freight trip.

10. **Phillip Logan** (Woods Hole) – Mr. Logan said that he isn't able to identify an objective function for the RFP for the Authority other than to say that they were doing something for the people of Woods Hole as long as it doesn't bother the people of the Vineyard. Mr. Logan

said that he believes that the final decision for the RFP will come from the two (2) island representatives as they have 70% of the vote. He said that he would like to compliment the RFP for inviting different methods of transporting things back and forth and hoped that the RFP would allow for more than one (1) arrangement if the Authority did receive a variety of reasonable bids. He said his complaint is that the bidders have been set up to name their own price for the service and that they will look at what the Authority offers them as they are a closer port and can keep the rates lower. Mr. Logan said that it will be difficult for a bidder to make a profit after paying the Authority for the services it provides and establishing a landside site for the off-Cape port. He said his biggest criticism of this RFP is that the Authority removed itself from underwriting this service, proving that the Authority isn't serious about getting this service started. He said that the studies done since 1990 found that it would be a good start for the service if the Authority set the rates from New Bedford the same as out of Woods Hole.

11. **Judy Laster** (Woods Hole) – Ms. Laster said that this same issue has been talked about for the last four or five years and the credibility of the process is in question. She said that the Authority needs to think about the communities it serves, not just ensuring that the Authority gets what it wants. Ms. Laster claimed that there are many issues beyond the 5:30 a.m. freight trip that need to be resolved and these schedule hearings are useless. She opined that the Authority doesn't care about the community and the toll the early morning freight trip takes on the residents of Falmouth. She said there is no reason why the Authority cannot implement the recommendations of the people of Falmouth, the Transportation Committee or Falmouth Selectmen and this lack of operating in good faith leaves others unwilling to collaborate on solving other issues the Authority faces.

Ms. Laster claimed that the Authority's bonding capacity was inadequate for purchasing new vessels and said that there should be an emergency financial plan for keeping the operations open. She questioned why the Authority is concerned about changing the term limits for the Authority's board when it's just the minimum standard of government. Ms. Laster stated she would like to submit a public records request for any and all documents relating to communications and deliberations both internally and externally regarding the decisions about the annual schedule as well as any deliberations on future schedules. In addition, Ms. Laster requested all documents and communications regarding compliance with state and federal clean air and water standards and any actions the Authority has had to take in response.

12. **Becky Connors** (Woods Hole) – Ms. Connors said that the traffic down Woods Hole Road is dangerous and requested consultants to do a traffic study before someone gets killed. She is a business owner on Woods Hole Road and stated that her motel guests are often woken up very early by trucks driving down to the terminal.

13. **Myla Kabat-Zinn** (Woods Hole) – Ms. Kabat-Zinn said that she thinks people have reached their limit on the level of frustration regarding the 5:30 a.m. freight trip. She said that she wants the Authority to respond positively to the requests of the community.

14. **Bonnie Simon** (Woods Hole) – Ms. Simon stated that she was sent a video of the truck traffic between 4:30-5:00 a.m. as they were heading to the terminal. She said it was shocking

to see truck after truck going down Woods Hole Road and thought it would be helpful if that video could be entered into the minutes of the meeting for everyone to see.

Receipt of Written Testimony Regarding the Proposed Schedules

In addition to conducting the hearing on June 8, 2022, the Authority encouraged additional public input by including the following statement within its scheduling advertisements: “If you have any comments, please submit them by May 31, 2022 via email to schedules@steamshipauthority.com or mail to the Steamship Authority, Attn: Proposed Schedule Changes, 228 Palmer Avenue, Falmouth, MA 02540.”

Copies of all of the written testimony received by the Authority at the above referenced email address are included herein as **Appendix C**.

2023 Operating Schedules

Following its receipt of the June 8, 2022, hearing testimony and the written comments submitted to schedules@steamshipauthority.com, the Authority focused its review upon the two (2) requests made within the Falmouth residents’ petition: (1) reported public health impacts caused by pre-dawn noise and (2) public safety concerns from freight truck traffic traveling over Falmouth roads to and from Woods Hole.

As now proposed, the 2023 Summer Operating Schedules between Woods Hole and Martha’s Vineyard, including the 5:30 a.m. daily freight trip departing from Woods Hole, would operate from May 18, 2023, through October 23, 2023.

Discussion

- A. The Authority will continue to operate its 5:30 a.m. freight trip from Woods Hole during its 2023 Summer Operating Schedules as it continues to work with its freight customers to mitigate early morning noise disruptions in Woods Hole.**

Following its receipt of the Falmouth residents’ May 31, 2022, petition, the Authority reviewed the procedures that were developed in conjunction with the Woods Hole/Falmouth Noise & Traffic Mitigation Working Group since August 2020. Copies of the Working Group’s meeting minutes can be viewed at www.steamshipauthority.com/about/meeting_notices. A memorandum addressing the Authority’s early morning operations at the Woods Hole Terminal that summarizes the efforts made to address the community’s concerns was appended to its Report Issued Under Section 15A of the Authority’s Enabling Act on the Proposed 2022 Summer Operating Schedules. A copy of the memorandum is again included herein as **Appendix D**.

In following-up the Working Group’s efforts, the Authority regularly communicates its terminal policies to manage the Woods Hole terminal traffic and noise mitigation policies to its

freight customers. A form letter is regularly sent to freight customers shipping early morning from Woods Hole. A copy of the form letter is included herein as **Appendix E**. The letter sets forth the following guidelines for all early morning trucks:

- Truck drivers are prohibited from idling their trucks' engines at any of our ferry terminals for more than five minutes in violation of chapter 90, section 16A, of the Massachusetts General Laws.
- Trucks are not to be backed up on terminal property except when necessary to stage them for boarding or to load them onto a ferry, with the permission of the Terminal Agent. In addition, when trucks are being backed up on terminal property, their back-up alarms may not be excessively loud, and should be adjusted to the extent possible so that they are only loud enough for their intended safety purposes.
- When driving to or from any of our ferry terminals, truck drivers are required to obey all posted speed limits and all other traffic laws, signs and restrictions, including stopping when required at all pedestrian and bicycle crossings. Truck drivers also should drive at all times in a safe and courteous manner towards other drivers, bicyclists, and residents of our surrounding communities.
- When driving on Woods Hole Road, drivers should reduce their speed well in advance of curves and downhill stretches so that they can minimize using their engine compression brakes (Jake brakes).
- Truck drivers may not stop or park alongside highways or roads where it is illegal to do so, such as alongside Woods Hole Road.

Furthermore, trucks are prohibited from arriving at the Woods Hole terminal prior to 6:30 a.m., except as follows:

- Trucks with reservations for the 5:30 a.m. trip may arrive beginning at 5:10 a.m.
- Trucks with reservations for the 6:00 a.m. trip may arrive beginning at 5:30 a.m.
- Trucks with reservations for the 6:30 a.m. and 6:45 a.m. trips may arrive at the terminal beginning at 6:00 a.m.
- Trucks with reservations for the 7:00 a.m. trip may arrive at the terminal beginning at 6:15 a.m.

Trucks that arrive at the Woods Hole terminal earlier than the above times are not allowed to travel on standby that day and/or may forfeit their reservations.

In addition, unless specifically approved by a Truck Coordinator in the Authority's Mashpee Reservations Office (for vehicles with reservations) or the Terminal Agent at the departure terminal (for vehicles traveling without reservations), the weight of vehicles traveling

on the Authority's vessels may not exceed: (a) 52,000 pounds for vehicles up to thirty (30) feet long; or (b) 86,000 pounds for vehicles thirty (30) feet or more in length. Vehicles in excess of the above weights may be accepted for travel only if the customer complies with all conditions as may be required by the Authority for such travel.

All travel on the Authority's ferries and use of its facilities are subject to these policies as well as the Steamship Authority's other published tariffs, policies and regulations, including its Customer Policy Handbook and its Rules and Regulations Governing Public Conduct on Terminal Property, both of which are posted on the Authority's website. All customer choosing to travel with us and/or use our facilities agree to abide by all of the terms and conditions of these policies.

To enforce these policies, the Authority monitors and logs early morning freight traffic daily. A copy of a recent and redacted daily log is included herein as **Appendix F**. Freight customers that violate the early morning arrival times are not permitted to travel on standby that day and/or may forfeit their reservations.

The Authority also works closely with its security partners at the Massachusetts State Police and its Commercial Vehicle Enforcement Section (CVES), which is responsible for conducting commercial vehicle safety inspections, staff weigh stations, and assist at crashes. In June 2022, the CVES performed spot weight checks on several commercial trucks at the Woods Hole terminal and issued fines to offending operators. The Authority intends to continue working with CVES to ensure that its operations with its freight customers are safe and lawful. These random inspections had previously been halted during the reconstruction of the Woods Hole terminal due to space limitations.

By implementing these measures, the Authority, through its efforts with the Working Group, has made significant strides in addressing the reported public health impacts caused by early morning noise and public safety concerns from freight truck traffic traveling over Falmouth roads to and from Woods Hole. The Authority intends to continue these efforts and hold its freight customers to an operating standard that meets the expectations of the Woods Hole community.

In a recent letter to the Authority, the Martha's Vineyard Hospital summarized the island's essential need for the Authority to continue operating its 5:30 a.m. daily freight trip departing from Woods Hole as follows:

The 5:30 a.m. ferry is essential to our core supply chain needs like food, linen, medical supplies, and specialty pharmaceuticals. These needs have been exacerbated by the pandemic; shortages of key supplies require us to order smaller shipments more frequently. As importantly, it is also an essential time for tradesmen to travel for services critical to the maintenance of our large campus-electricians; plumbers; HVAC contractors; biomedical engineers and the like, to arrive, perform needed services and to return to the mainland. Beginning early means these contractors can maximize their productivity in a day, avoid costly lodging expenses, and keep us up and running to serve the community when something breaks unexpectedly.

To assume this level of daily need can simply be moved to a later ferry is impractical especially “in season” when the ferry schedules fill quickly. It would disrupt our delivery of patient care; create a hardship to our employees who commute; negatively impact our daily supply chain requirements; and further exacerbate traffic and congestion patterns creating a predictable, negative (and avoidable) domino effect on the Island and in Woods Hole during early commuter hours.

Section 11 of Chapter 55 of the acts of 2003 amended Section 129 of Chapter 46 of the acts of 2003 and imposed “an embarkation fee upon all passenger ferry trips, excluding those ferry boats that are licensed to transport not more than 100 passengers, originating from a port located within such city or town, at a rate of \$.50 per passenger per departing trip.” Since 2004, the Authority has paid the Town of Falmouth over \$6.5 million dollars in embarkation fees, which are fees “to be solely appropriated for the purpose of mitigating the impacts of ferry service on the city or town. Monies deposited may be appropriated for services including, but not limited to, providing harbor services, public safety protection, emergency services or infrastructure improvements within and around the harbor of any city or town which receives monies from this section.” See *Section 129(d) of Chapter 46 of the acts of 2003*. A copy of the Authority’s February 2021 report on embarkation fess is included herein as **Appendix G**.

If the Town finds that there are public health impacts and public safety concerns attributable to freight truck traffic, embarkation fees are available to mitigate these impacts and concerns assuming that the offending freight truck traffic is related to the Authority’s operations. A recent report on the viability of short-sea shipping from southeastern Massachusetts prepared by the Urban Harbors Institute and Flagship Management on behalf of the Massachusetts Department of Transportation found “the number of trucks using Steamship Authority vessels represents less than 0.2% of all traffic passing over the Bourne and Sagamore Bridges, (and) it is unlikely that shifting these vessels to an earlier port of origin will have much impact on bridge traffic. Further, impacts to the overall volume on Falmouth roadways, generally, might also be negligible.” A copy of the September 2021 report is included herein as **Appendix H**.

In summary, the Authority continues to deem its 5:30 a.m. daily freight trip departing from Woods Hole as a vital component of its summer operating schedule and an essential service to Martha’s Vineyard. The Authority will continue to work with the Working Group, its freight customers, the Massachusetts State Police and the CVES and the Town of Falmouth to ensure that its operations are safe, lawful and respectful to the Woods Hole community’s concerns. If the Town of Falmouth wishes to study public safety concerns from freight truck traffic traveling over Falmouth roads to and from Woods Hole then embarkation fess should be available to fund the study.

To report any traffic congestion or related noise concerns, please find contact information for the Authority at <https://www.steamshipauthority.com/about/contact> or send an email to whtraffic@steamshipauthority.com.

B. The Authority will not operate a “late-night” commuter service for Martha’s Vineyard’s hospitality employees during its 2023 Summer Operating Schedules as its 2022 summer occupancy report fails to support incurring the costs associated with operating round-trip service at that time of night.

In response to a recent inquiry about providing a “late night” commuter service for Martha’s Vineyard hospitality workers, the Authority reviewed its 2022 occupancy reports for the period between June 2022 and August 2022. During that time, the Authority transported an average of 111 passengers on its 9:30 p.m. departure from Vineyard Haven to Woods Hole. Of the 111 passengers, approximately one-half of these passengers traveled with their vehicles. Accordingly, some fifty-five passengers walked on the vessel to depart the island.

To consider operating additional roundtrips beyond the currently scheduled 9:30 p.m. departure from Vineyard Haven, the Authority would need to transport approximately 425 passengers at a minimum to cover the vessels’ related fuel expenditures at the current budgeted cost of \$4.05 per gallon. Without any definitive indication of a demand for this level of service at that time of night, the Authority is not inclined to amend its 2023 Summer Operating Schedules for the purpose of providing “late-night” commuter service.

C. In an effort to divert some freight traffic from Falmouth, the Authority issued a Request for Proposals from parties seeking to conduct licensed freight operations between the City of New Bedford or another off-Cape port and Martha’s Vineyard, but the Authority did not receive any proposals.

In response to the Woods Hole Community’s requests and its public safety concerns attributable to freight truck traffic and in an effort to discover potentially viable alternatives for Martha’s Vineyard, the Authority issued a Request for Proposals (RFP) in March 2022 that sought proponents of a new freight service from an off-Cape port “to become a long-term part of the marine transportation network.” A copy of the Notice of the RFP can be found at [the Authority’s website](#).

Multiple publications advertised the RFP including newspapers, the *Cape Cod Times* and the New Bedford *Standard-Times*, and marine publications such as *Marine Link*, *Boats & Harbors*, *Maritime Reporter* and an email blast by *Marine Log* that was sent to approximately 20,000 subscribers, which included a full-color advertisement of the RFP notice. Proponents had nearly five (5) months to submit their proposals before August 2, 2022. The RFP encouraged potential proponents “to contact the SSA if they believe there are any provisions in the RFP that are too restrictive for a successful freight service for the island of Martha’s Vineyard so that the SSA can review those provisions and, if possible and appropriate, address any concerns.” Yet, the Authority did not receive any proposals or any requests for an extension of time before the August 2, 2022, deadline. The Authority is currently contacting the forty-seven (47) companies that made inquiries about the RFP to learn the reasons for their refusal to submit proposals.

After compiling the responses from the forty-seven (47) companies, staff intends to set a meeting of the Authority’s Long-Range Vineyard Task Force to discuss the RFP and the feedback

from the inquiring companies that failed to submit bids. Thereafter, the Task Force should draft and submit a report, which would be added to the agendas of the Port Council and Board for consideration of next steps.

Finally, the Authority is awaiting receipt of proposals in response to its July 2022 RFP seeking consulting services to develop a strategic plan. A copy of the Notice of the RFP can be found at [the Authority's website](#). Proponents have until October 4, 2022 to submit proposals. Staff intends to conduct the Authority's strategic planning efforts with the members of the Long-Range Vineyard Task Force and make their recommendations along with those of the retained consultants to the Port Council and Board for consideration and eventual implementation. Island traffic demands and the impacts that those demands have on mainland communities will be an essential part of this initiative as the Authority examines its short-term and long-term goals in providing its essential service to the islands.

APPENDIX A

Petition to Steamship Authority for Public Hearing on Proposed Schedules in 2023

May 31, 2022

Dear Steamship Authority General Manager Robert Davis,

We, the undersigned, are writing to renew our strenuous objection to the 5:30AM freight trip from Woods Hole proposed by the Steamship Authority concerning its 2023 freight operating schedules between Woods Hole and Martha's Vineyard as announced in the Steamship Authority's advertisement in the Falmouth Enterprise and on the SSA website.

We object to the SSA scheduling of the 5:30AM early morning freight from Woods Hole to Martha's Vineyard and its multiple negative public health impacts on Falmouth and Woods Hole residents caused by pre-dawn noise as well as the ever increasing threats to public safety resulting from increasing freight truck traffic over Falmouth roads leading to and from Woods Hole. Alternative scheduling proposed by the Falmouth Transportation Committee would address this matter. The Falmouth Select Board has repeatedly [requested](#) that the 5:30AM freight schedule be eliminated. The consistent failure of the SSA to consider the impact of its schedules on the residents of this community is unacceptable and must change immediately.

We request that you conduct a public hearing to be held within 14 days of receipt of this petition on the proposed 2023 freight operating schedules, per Section 15A of the Steamship Authority's Enabling Act.

Sincerely,

Petition to Steamship Authority for Public Hearing on Proposed Schedules in 2023

[See 160 signatures at the bottom of this email]

In addition to the 5:30AM freight scheduling from Woods Hole, the following topics will be addressed during the public hearing:

- Failure of the Steamship Authority to address the health and safety consequences of Steamship Authority's continuing increase of freight truck traffic ([56,522](#) freight trucks were carried through WH terminal in 2021, an increase of 6% since 2019) on Falmouth and Woods Hole residents; that includes freight truck and passenger bus idling at Woods Hole terminal, diesel soot from such a high concentration of diesel trucks, and the creation of unsafe conditions on our roadways;
- Failure of the Steamship Authority to take adequate steps to shift non-time-sensitive Vineyard freight (landscaping materials such as sod/gravel/rocks/mulch/large trees, septic, demolition, construction materials, trash) to an off-Cape port as an alternative to increasing freight capacity through Cape Cod port communities; the currently issued Request for Proposals for off-Cape service appears “designed to fail” and has too many restrictive conditions; for example, the Request bans the future off-Cape freight carrier from taking automobiles to and from the Vineyard in the event of extra space on the carrier’s freight decks;
- Failure of the Steamship Authority to address in any significant way traffic back-up and parking issues in Woods Hole village;
- Failure of the Steamship Authority to limit in any significant way its use of the northern-most slip (no. 3) at Woods Hole terminal, despite the completion of the

Petition to Steamship Authority for Public Hearing on Proposed Schedules in 2023

southern-most (no. 1); we observe that the no. 3 slip is being used as actively as the other two slips; it was promised that the no. 3 slip would only be used actively on an exceptional basis;

- Failure of the Steamship Authority to negotiate an agreement with the Town of Falmouth to cap the growth of the number of freight trips it will operate from Woods Hole village (the Town of Barnstable has had such an agreement in place since 1997);

- Failure of the Steamship Authority to convert its passenger bus fleet from diesel to electric; the SSA currently does not have any electric buses; in comparison, Vineyard Transit Authority already operates 16 electric buses;

- Other SSA-related topics of concern to Falmouth residents.

Petition to Steamship Authority for Public Hearing on Proposed Schedules in 2023

1	Kristin	Alexander
2	Jay	Allison
3	Melissa	Allison
4	Douglas	Amon
5	Porter	Anderson
6	Willa	Appel
7	Richard	Armstrong
8	Jelle	Atema
9	Jane Evelyn	Atwood
10	Janet	Azarovitz
11	Bobbi	Bailin
12	Richard	Balkin
13	Elaine	Bearer
14	Paula	Beckerle
15	Barbara	Blair
16	Wendy	Blomberg
17	Robert	Blomberg
18	Matthias	Bossi
19	Jean	Bourdon
20	Carol	Bowers
21	Catherine	Bumpus
22	Molly	Cabral
23	Ann W	Carlton
24	Michael	Cohen
25	Alberto	Collasius
26	Rebecca	Connors
27	Hannah	Coppola
28	Tom	Crane
29	Kate	Davis
30	Judith	Day
31	Kate Nace	Day
32	Roger	Day
33	Lore	De Bower
34	Karen	Dell
35	Edward	DeWitt
36	Judith	Dowling

Petition to Steamship Authority for Public Hearing on Proposed Schedules in 2023

37	John	Dowling
38	Rebecca	Eder
39	Dianne	Edgar
40	Kathryn	Elder
41	Jan	Elliott
42	Gerald	Fine
43	Harvey	Fishman
44	Claude	Frankignoul
45	Melissa	Freitag
46	Isabel	Friedman
47	Patricia	Gadsby
48	Ruth	Gainer
49	LOIS	GARRETTLOGAN
50	Ronald	Geering
51	Stephen	Gellis
52	Jonathan	Goldman
53	Nicole	Goldman
54	Joyce	Gore
55	John	Gore
56	Daniel	Gould
57	Monique	Gregg
58	Susanne	Hallstein
59	WILLIAM	HALLSTEIN
60	Anne	Halpin
61	Dawna	Hammers
62	Jennifer	Hastings
63	David	Hastings
64	Laura	Hastings
65	Nina	Hocker
66	Andy	Hocker
67	Richard	Hugus
68	Kara	Hume
69	Tom	Jay
70	Robert	Jaye
71	Peter	Jeffrey
72	Barbara	Jones

Petition to Steamship Authority for Public Hearing on Proposed Schedules in 2023

73	Doug	Jones
74	Myla	Kabat-Zinn
75	Richard	Kendall
76	Patricia	Keoughan
77	Wendy	Kingerlee
78	Klem	Klimek
79	Craig	Korr
80	suzanne	kuffler
81	Damien	Kuffler
82	Eugenie	Kuffler
83	Mandi	Kunen
84	Edward	Lafontaine
85	Rebecca	Lash
86	Stephen	Laster
87	Judith	Laster
88	Alison	Leschen
89	Leslie	Lind
90	Tim	Lineaweaver
91	Paul	Lobo
92	Philip	Logan
93	Deborah	Maguire
94	Gail	Mandel
95	David	Martin
96	Margaret	McCormick
97	Dianne	McPherson
98	Debra	Michlewitz
99	JAMES	MOFFETT
100	Maria	Moniz
101	Robert	Morris
102	Kathleen	Mortenson
103	Kenneth	Muller
104	Russell	Murphy
105	James	Newman
106	Wendy	Nies
107	Karen	Olcott
108	Hillary	Osborn

Petition to Steamship Authority for Public Hearing on Proposed Schedules in 2023

109	Mary	Paci
110	Christopher	Paci
111	Kim	Pedersen
112	Colleen	Peterson
113	Robert	Peterson
114	Sara	Piccini
115	Dana	Platt
116	Tammela	Platt
117	Terry	Platt
118	Cynthia	Rankin
119	Nava	Renek
120	William	Roslansky
121	Diana	Roth
122	BILL	RUGH
123	Monika	Salm-Sturm
124	C. Diane	Salte
125	Jill	Sansone
126	Nan	Schanbacher
127	Walt	Schanbacher
128	Ann	Sears
129	Peter	Shile
130	Joan	Short
131	Bonnie	Simon
132	Andrew	Solow
133	Wallace	Stark
134	Pamela	Stark
135	David	Steger
136	Aminta	Steinbach
137	Joyce	Stratton
138	Brian	Switzer
139	Rachel	Switzer
140	Nina	Tannenwald
141	Peter	Tobias
142	Nat	Trumbull
143	Elena	Trumbull
144	David	Tucker

Petition to Steamship Authority for Public Hearing on Proposed Schedules in 2023

145	Joan	Tweedell
146	Jane	Vose
147	peter	waasdorp
148	Peter	Waksman
149	Nathalie	Ward
150	Susan	warren
151	Gretchen	Warren
152	Alice	Weiss
153	Marisa	Weiss
154	Lauren	Weiss
155	Kathryn	Wilson
156	Susan	Wilson
157	John	Woodwell
158	Gregory	Wozena
159	Shirley	Wozena
160	David	Zenga

Addresses of signers of petition to Steamship Authority concerning 2023 schedules

1	Kristin	Alexander	101 Cumloden Drive, Falmouth
2	Jay	Allison	50 Hilton Ave, Woods Hole, MA 02543
3	Melissa	Allison	50 Hilton Ave, Woods Hole, MA 02543
4	Douglas	Amon	8 Quissett Ave Woods Hole,MA 92643
5	Porter	Anderson	12 Park Rd, Woods Hole MA
6	Willa	Appel	360 W. 121 Street NY NY 10027
7	Richard	Armstrong	57 Millfield. WoodsHole. Mass. 02543
8	Jelle	Atema	10 Quissett Ave
9	Jane Evelyn	Atwood	41 High Street Woods Hole
10	Janet	Azarovitz	20 Shapquit Bars Circle
11	Bobbi	Bailin	west falmouth hiway,, West falmouth, MA
12	Richard	Balkin	3 oyster pond rd
13	Elaine	Bearer	321 Big Horn Ridge Dr. NE, Albuquerque, NM 87122
14	Paula	Beckerle	38 Two Ponds Rd
15	Barbara	Blair	246 Woods Hole Road
16	Wendy	Blomberg	559 Woods Hole Road
17	Robert	Blomberg	559 Woods Hole Rd Woods Hole MA 02543
18	Matthias	Bossi	1 Wilson Road Woods Hole MA 02543
19	Jean	Bourdon	124 Siders Pond Road
20	Carol	Bowers	206 SIDERS POND RD
21	Catherine	Bumpus	PO Box 703
22	Molly	Cabral	185 Sandpiper Ln #11 VH MA 02568
23	Ann W	Carlton	71 Dodson Way, East Fslmouth, MA 02636
24	Michael	Cohen	552 LaGuardia Place, apt.4, NY, NY 10012
25	Alberto	Collasius	11 juniper point woods hole
26	Rebecca	Connors	540 woods hole road woods hole Ma 02543
27	Hannah	Coppola	40 Eric Clauson Lane, Falmouth, MA 02540
28	Tom	Crane	35 Juniper Point Road, WH
29	Kate	Davis	112 Ransom Road Falmouth Mass.
30	Judith	Day	55 Larches Way. Woods Hole. Ma 02543
31	Kate Nace	Day	5 Bowditch Road Wood Hole
32	Roger	Day	55 Larches Way
33	Lore	De Bower	16 Wilson Rd
34	Karen	Dell	10 Gardiner Rd, Woods Hole, MA 02543
35	Edward	DeWitt	116 Pin Oak Way, Falmouth
36	Judith	Dowling	106 Ransom Road
37	John	Dowling	106 Ransom Road
38	Rebecca	Eder	25 Gardiner Rd., Woods Hole, MA 02543
39	Dianne	Edgar	25 Millfield Street, Woods Hole, MA. 02543
40	Kathryn	Elder	161 Blacksmith Shop Rd
41	Jan	Elliott	9 Glendon Rd./PO Box 598 Woods Hole MA 02543
42	Gerald	Fine	21 Church Street, Woods Hole MA 02543
43	Harvey	Fishman	232 Quissett Ave
44	Claude	Frankignoul	21 High street, Woods Hole 02543

Addresses of signers of petition to Steamship Authority concerning 2023 schedules

45	Melissa	Freitag	PO Box 692 Woods Hole
46	Isabel	Friedman	26 Buzzards Bay Ave
47	Patricia	Gadsby	77 F.R. Lillie Rd, Woods Hole
48	Ruth	Gainer	34 High St., Woods Hole, MA 02543
49	LOIS	GARRETTLOGAN	482 WOODS HOLE ROAD, WOODS HOLE MA 02543
50	Ronald	Geering	246 Woods Hole Road
51	Stephen	Gellis	24 Spencer Baird rd Woods hole MA
52	Jonathan	Goldman	12 Sidney Street Woods Hole MA 02543
53	Nicole	Goldman	12 Sidney Street Woods Hole MA 02543
54	Joyce	Gore	530 Woods Hole Road
55	John	Gore	530 Woods Hole Road
56	Daniel	Gould	21 hallets lane falmouth mass 02540
57	Monique	gregg	250 woods hole road
58	Susanne	Hallstein	36 South Rd Falmouth,MA 02540
59	WILLIAM	HALLSTEIN	36 South Road
60	Anne	Halpin	319 Woods Hole Road
61	Dawna	Hammers	326 Woods Hole Rd Falmouth, MA 02541
62	Jennifer	Hastings	18 Spencer Baird
63	David	Hastings	18 Spencer Baird Rd. Woods Hole, MA 02543
64	Laura	Hastings	18 Spencer Baird
65	Nina	Hocker	117 Pin Oak Way
66	Andy	Hocker	117 Pin Oak Way, Falmouth, MA
67	Richard	Hugus	312 Woods Hole Rd.
68	Kara	Hume	7 Millfield Street Woods Hole, Ma 02543
69	Tom	Jay	58 Pin Oak Way
70	Robert	Jaye	7 church street WoodsHole ma 02543
71	Peter	Jeffrey	98 Gansett Road
72	Barbara	Jones	38 Locust St., Falmoutj, MA 02540-2657
73	Doug	Jones	84 siders pond rd
74	Myla	Kabat-Zinn	46 Buzzards Bay Ave., Woods Hole
75	Richard	Kendall	16 Pin Oak Way, Falmouth, MA 02540
76	Patricia	Keoughan	86F Riddle Hill Rd., Falmouth
77	Wendy	Kingerlee	14 James Street, Woods Hole, MA 02543
78	Klem	Klimek	8 Quissett Harbor Rd
79	Craig	Korr	4606 Fordham Rd
80	suzanne	kuffler	49 Gosnold Road
81	Damien	Kuffler	49 Gosnold Rd., Woods Hole, MA 02543
82	Eugenie	Kuffler	49 Gosnold Rd, Woods Hole, 02543 MA
83	Mandi	Kunen	134 Siders Pond Road
84	Edward	Lafontaine	7 Cricket Ln, Woods Hole, MA 02543
85	Rebecca	Lash	15 High St
86	Stephen	Laster	322 Woods Hole rd. Falmouth MA 02540
87	Judith	Laster	20 Glendon Road Woods Hole, MA 02543
88	Alison	Leschen	15 Lantern Ln, Falmouth, MA 02540

Addresses of signers of petition to Steamship Authority concerning 2023 schedules

89	Leslie	Lind	313 N Bush
90	Tim	Lineaweaver	410 Woods Hole Road
91	Paul	Lobo	114 Ships Watch
92	Philip	Logan	482 WOODS HOLE RD
93	Deborah	Maguire	105 Pin Oak Way
94	Gail	Mandel	10 Orchard Street Woods Hole
95	David	Martin	10 Buzzards Bay Ave, Woods Hole, MA
96	Margaret	McCormick	44 Quissett Ave, Woods Hole MA 02543
97	Dianne	McPherson	520 Woods Hole Rd Woods Hole MA 02543
98	Debra	Michlewitz	24 Braxton Rd
99	JAMES	MOFFETT	70 Siders Pond Road
100	Maria	Moniz	14 Ludlam St
101	Robert	Morris	45 Quissett Ave Woods Hole
102	Kathleen	Mortenson	116 Pin Oak Way
103	Kenneth	Muller	Marine Biological Laboratory, Woods Hole, Massachusetts 02543
104	russell	murphy	5 bowditch road woods hole ma 02543
105	James	Newman	5 Buzzards Bay Ave, Woods Hole MA 02543
106	Wendy	Nies	49 Glendon Road
107	Karen	Olcott	141 Fay Road
108	Hillary	Osborn	73 Spectacle Pond Dr
109	Mary	Paci	5 Little Harbor Road Woods Hole, MA 02543
110	Christopher	Paci	5 Gardiner Road, Woods Hole, MA 02543
111	Kim	Pedersen	1 old manchester rd Essex, ma
112	Colleen	Peterson	11 Bounty Ln
113	Robert	Peterson	11 Bounty Lane
114	Sara	Piccini	11 Bigelow Street Woods Hole MA 02543
115	Dana	Platt	25 Millfield Street, Woods Hole, MA. 02543
116	Tammela	Platt	25 Millfield Street, Woods Hole, MA. 02543
117	Terry	Platt	25 Millfield Street, Woods Hole, MA. 02543
118	Cynthia	Rankin	82 Siders Pond Road
119	Nava	Renek	43 Needles Lane
120	William	Roslansky	26 Albatross street, woods hole, ma
121	Diana	Roth	PO Box 651 Woods Hole, Ma 02543
122	BILL	RUGH	37 GOSNOLD ROAD, WOODS HOLE MA 02043
123	Monika	Salm-Sturm	Greifswalderstr. 219, D-10405 Berlin
124	C. Diane	Salte	7 Siders pond road
125	Jill	Sansone	60 Whitman Road. Woods Hole. MA. 02543
126	Nan	Schanbacher	14 Cowdry Rd, Woods Hole, MA 02543
127	Walt	Schanbacher	14 Cowdry Road, Woods Hole, MA 02543
128	Ann	Sears	96 Locust St.
129	Peter	Shile	25 Gardiner Road
130	Joan	Short	187 Siders Pond Rd
131	Bonnie	Simon	144 Gardiner Rd

Addresses of signers of petition to Steamship Authority concerning 2023 schedules

132	Andrew	Solow	44 Quissett Ave, Woods Hole MA 02543
133	Wallace	Stark	9 Little HatborRd
134	pamela	stark	9 Little Harbor Rd
135	David	Steger	85 Pin Oak Way
136	Aminta	Steinbach	18 Mast Rd Woods Hole, MA 02543
137	Joyce	Stratton	22 Water St. Woods Hole, MA 02543
138	Brian	Switzer	6 Quisseett Ave
139	Rachel	Switzer	6 Quissett Ave Woods Hole
140	Nina	Tannenwald	25 Bar Neck Road
141	Peter	Tobias	564 Arden Drive, Encinitas, CA 92024
142	Nat	Trumbull	11 Church St
143	Elena	Trumbull	11 Church St
144	David	Tucker	1 Buzzards Bay Ave
145	Joan	Tweedell	41 Wilson Road, Woods Hole MA 02543
146	Jane	Vose	468 Woods Hole Rd, WH 02543
147	peter	waasdorp	57 Beccles Road, Falmouth 02540
148	Peter	Waksman	103 Gardiner Rd
149	Nathalie	Ward	42 Glendon Rd Woods Hole MA 02543
150	Susan	warren	132 Siders Pond Rd
151	Gretchen	Warren	7 Cricket Ln, Woods Hole, MA 02543
152	Alice	Weiss	44 Harbor Hill Road
153	Marisa	Weiss	26 buzzards bay ave, woods hole, MA 02543
154	Lauren	Weiss	44 Harbor Hill Rx, Woods Hole MA 02543
155	Kathryn	Wilson	50 Glendon Road
156	Susan	Wilson	23 Gardiner Road, Woods Hole, MA 02543
157	John	Woodwell	64 Church Street
158	Gregory	Wozena	296 Woods Hole Rd., Falmouth, MA
159	Shirley	Wozena	296 Woods Hole Rd, Falmouth,MA
160	David	Zenga	4 Leslie Street, Woods Hole, MA 02543

APPENDIX B

Terence Kenneally: Good afternoon. My name is Terence Kenneally and I am General Counsel for the Steamship Authority. We are here to conduct a public hearing pursuant to Section 15 of the Enabling Act concerning the Authority to propose 2023 summer and fall operating schedules. I'd like to inform everyone that Sean Driscoll, the Authority's communication director, and Steve Baty of All Media Productions are making audio and video recordings of today's hearing. There may be other people who are making audio recordings of this meeting as well.

Please note that the hearing being conducted by the Authority today is not a board meeting. Accordingly, the Authority board members may be in attendance, but they will not be deliberating on the proposed schedule, changes today, or otherwise responding to any testimony at this time. Board members are here to listen and so are we. Today's recording of the hearing will be available to them so that they can review it after the hearing is concluded. It will also be posted on the Authority's YouTube page at www.youtube.com/SteamshipAuthority1.

Okay. I'd like to introduce some of the members of the Authority staff who are here with me today as well. Their responsibilities include reservations and terminal operations. To my left is Director of Shoreside Operations Alison Fletcher. To my right here is General Manager Robert B. Davis. The Authority's Enabling Act requires the Authority to post and advertise in newspapers with a general circulation in Falmouth, Barnstable, Martha's Vineyard, Nantucket, and New Bedford, all of its proposed schedule changes at least 60 days prior to their effective dates.

Accordingly, in April, the Authority placed newspaper advertisements of its proposed 2023 summer and fall operating schedules for the period from May 18, 2023, through January 3rd, 2024. The Authority's Enabling Act also provides that if the Authority receives a petition within 30 days of those advertisements that is signed by not less than 50 persons or residents of any of those communities requesting a public hearing on the proposed schedule changes, the Authority shall conduct the public hearing within 14 days of receiving the petition.

On May 31st, the Authority received a petition with respect to its proposed 2023 operating schedules between Woods Hole and Martha's Vineyard that was signed by 160 residents in the town of Falmouth. As a result, we are conducting today's hearing. The purpose of today's hearing is to receive testimony regarding the Authority's proposed schedule changes to ensure that we gain the benefit of the views of the parties affected. The Authority will also consider written testimony that is submitted regarding the proposed schedule changes.

We ask that the written testimony be submitted as soon as possible after today's hearing to ensure that it's timely considered. Written testimony can be emailed to schedules@SteamshipAuthority.com. During this hearing we will not be accepting comments or questions via Zoom chat function which has been turned off. If there are additional comments or questions people wish to submit in writing, please email them to the schedules@SteamshipAuthority.com email address.



In their petition, the 160 Falmouth residents objected to the Authority's proposed 2023's freights operating schedules between Woods Hole and Martha's Vineyard as announced in the Authority's newspaper advertisements. As advertised, the Authority's proposed 2023 freight operating schedules between Woods Hole and Martha's Vineyard would be essentially the same freight operating schedules that were approved for 2022 as well as the same freight operating schedules that were run in 2018, 2019, and 2021. The same freight schedule was approved for 2020, but our schedules were modified because of the Coronavirus pandemic.

For 2023, the Authority is proposing to operate a 5:30 AM freight trip from Woods Hole only during its summer operating schedules with a motor vessel governor from May 18th through October 23rd, 2023. The Authority is also proposing to continue to limit the size of the trucks the Authority carries on its 5:30 AM freight trip from Woods Hole to trucks that are less than 40 feet in length, which it began doing in 2018, so that less noise is generated by the trucks that drive to the Authority's Woods Hole terminal in the early morning hours.

After receiving and reviewing the oral and written testimony provided through today's hearing, the staff will prepare one or more draft reports recommending either that the Authority maintains portions of its 2023 schedule as originally proposed or that it make modifications to those proposed schedules. The staff will also explain the reasons for the recommendations, summarize the oral testimony received and attach all written testimony received.

When each draft report is prepared it will be forwarded to the Authority's board and port council members and then posted on the Authority's website. We will also email people to let them know of the availability of the draft report if they have provided us with their email addresses through the written testimony or if they emailed us following the hearing, asking us to send it to them. Again, all email requests should be sent to schedules@SteamshipAuthority.com.

We will now call on members of the public who have joined the Zoom hearing. I see attendees list there, 200 and about 62 people. We will at first ask elected officials who may be on the call if they wish to testify. Then because the petition objects generally to the Authority's proposed 2023 freight operating schedule between Woods Hole and Martha's Vineyard, Nat Trumbull, who submitted the petition on behalf of the petitioners, will be asked to testify. Please note that this hearing is not an adjudicatory proceeding. Therefore, we will not be asking people to testify under oath nor will we restrict people's comments to testimony that conforms to the rules of evidence observed by courts.

Finally, please keep in mind that we would like everyone who wants to give testimony today to have a fair opportunity to testify. If there is time after we receive everyone's testimony, we will try to give people an opportunity to testify a second time, for the purpose of responding to comments made after they gave their initial testimony. In the event that we don't have time for those responses, we again

encourage everyone to submit that written testimony to the email address schedules@SteamshipAuthority.com.

With that, I'll turn it over to Sean who will be monitoring the attendees' list and operating the Zoom because he's much more qualified to do that than I am. With that, Sean, go ahead.

Sean Driscoll: Thank you. First I'd like to ask if there are any elected officials in the audience who wish to testify. If so, please click the "Raise My Hand" icon on your Zoom screen or press "*"9" on your telephone keypad. I see Nat has already raised his hand up. I see Kat Monterosso. Kat, can you identify if you're an elected official first and if not, then we'll get back to you after Nat.

Kat Monterosso: I'm not an elected official. Thank you.

Sean: Okay. Hang tight then. We'll come back to you. I don't see anyone raising their hands so I will start then with Mr. Trumbull. If everyone else can start raising their hands as they wish.

Nat Trumbull: My name is Nat Trumbull, 11 Church Street, Woods Hole. There are multiple public health and public safety negative impacts for Falmouth residents from the Steamship Authority's proposed schedules for summer and fall 2023. I'd like to describe some of those negative public health and public safety impacts on Falmouth residents now.

First, there's the daily pre-dawn noise disturbance of hundreds of Falmouth residents in their homes along Palmer Ave, Locust Street, Woods Hole Road, Crane Street, and Cowdry Road. The Steamship Authority freight trucks race to make the 5:30 AM freight ferry every day, which the Steamship Authority is once again proposing to schedule in 2023.

Question, can the Steamship Authority provide credible evidence that the 5:30 AM freight schedules is not, directly or indirectly, regularly waking up residents in Falmouth and creating a public health nuisance and hazard? The Steamship Authority has to understand that some residential homes are within 15 feet of Woods Hole Road.

The Steamship cannot pretend that its freight customers are not waking up Falmouth residents on a daily basis at pre-dawn hours. Nor can the Steamship Authority claim that by limiting the truck length to 40 feet, as the Steamship has done, on the 5:30 freight ferry that those trucks are no longer waking up residents. A 40-foot truck is still a very large and very noisy truck.

I'd like to know why the Steamship Authority has never addressed the topic of public health impacts from sleep disruption in prior section 15A reports? As one reads those reports, it's as if there is no sleep disruption or negative public health impact is taking place at all. Question, in your section 15A findings and report for the 2023

schedules, can the Steamship Authority explain how it is reasonable for people who live in residential neighborhoods to be awoken at 5:00 AM and earlier?

We read in last year's section 15A report that the 5:30 AM freight ferry carries some percentage of food trucks. If the Steamship Authority is scheduling that percentage of food trucks in the 5:30 AM ferry, rather than the 6:00 AM or 6:30 AM or 7:00 AM or later, 5:30 AM ferry will have food trucks on it. There are currently seven other boats leaving Woods Hole in the morning that can carry freight between 6:00 AM and 8:35 AM. Isn't that enough capacity to find room for Vineyard food trucks on any of those seven other early morning boats?

In other words, at the steamship, we're not scheduling in the early morning as much landscaping material sod, gravel, rock, mulch, daily linen trucks from linen cleaning services, demolition and trash trucks returning to the Vineyard. There would be adequate room for food trucks on the other seven morning ferries scheduled between 6:00 AM and 8:35 AM from Woods Hole terminal. By the way, it's the trucks that are bothering us. It's not automobiles and passengers. A 5:30 daily ferry schedule for automobiles and passengers would be perfectly acceptable.

As best we can tell freight shippers prefer the earlier boats for the convenience of drivers so that they can move around unfettered on the island before traffic builds up. Since when are commercial interests placed above legitimate public health impacts and concerns? This from a quasi-public agency with a commitment to, "Be in all respects for the benefit of the people of the commonwealth and for the improvement of their health and living conditions." According to the Steamship Authority's Enabling Act.

Question, how can the Steamship Authority and its section 15A report from this hearing justify the health impacts of waking hundreds of Falmouth with residents on a daily basis at pre-dawn hours solely to meet the commercial interests of shippers on the Vineyard. There are other health impacts on our neighborhoods, the 56,000 freight trucks that the Steamship Authority carried through our communities in 2021 are all diesel trucks.

We experience the diesel soot from those trucks in our air, we see the soot on our windows and windows sills and we breathe that diesel soot.

This is what 56,000 diesel trucks spew into our neighborhoods each year. The same can be said for particulate matter 2.5, which also has been scientifically demonstrated to cause long-term health hazards from prolonged exposure.

There are other impacts from your currently proposed scheduling for 2023 that include negative public safety impacts on Falmouth residents. 18 and 20-wheel trucks carried by the steamship can be so heavy that they are unable to stop in enough time for Falmouth school buses stopping at their bus stops. We have photographs and video documentation of exact incidents like this. In one case I followed a truck driver who had failed to stop at a bus stop down to the Steamship Authority's Woods Hole terminal. When I asked the driver why he hadn't stopped in

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time for the stopped school bus that was picking up children, the driver explained that his load was too heavy to stop in time for that school bus.

The Falmouth/Woods Hole Noise and Traffic Working Group, which I'm a member and about which I'll say more in a moment, has strongly suggested that Steamship Authority ask the state police truck unit to conduct spot weight checks at Woods Hole terminal and on the Vineyard for Steamship Authority carried freight trucks.

As far as I know, the Steamship Authority has not yet contacted the truck unit. As an aside Sergeant Morris of that truck unit confirmed the other day that overweight violations are not uncommon on trucks when his unit checks those trucks on Route 3 those trucks going to Nantucket. No surprise the Steamship Authority charges freight solely by truck length, not weight.

Another negative public safety impact and probably the most visible are traffic backups in Woods Hole and Falmouth due to those approximately 50,000 to 60,000 cars each month in summer that the Steamship Authority adds to the Falmouth/Woods Hole quarter. Last summer's backups were as visible as ever reaching, on at least one occasion from Woods Hole Village, along Woods Hole Road right back to the golf course. We had been assured by the Steamship Authority prior to that that such backups would not occur. During those backups, no emergency vehicles, no ambulances, no fire engines, even police can use our main throughfare to Woods Hole Village.

One of the clear sources of those traffic backups is the Steamship Authority's current standby system. The Steamship Authority insists on there being standby available days on weekdays and summer. This makes all the difference in terms of increasing the likelihood of backups on Crane Street and Woods Hole Road. The Steamship Authority actively promotes the standby availability on its website, but it's the same standby policy that generates unpredictable demand at Woods Hole terminal for which Steamship Authority employees, frankly, can't always be prepared logistically.

This summer and next, the Steamship Authority is leaving unchanged at standby policy from last year. We can expect long backups on Crane Street and on Woods Hole Road. Question, how will this year's section 15A report show that the Steamship Authority's current policy to make standby available on weekdays is not the source of backups on Crane Street and Woods Hole road?

Next, and related to the issue of backups, is the issue of chronic problems with congestion on Palmer Ave in the vicinity of Falmouth Hospital. The danger of ambulances being delayed and their access to Falmouth Hospital is obvious. Question, in your section 15A report findings, can the Steamship Authority explain why it's reasonable for Falmouth residents or visitors to wait backed up in Steamship Authority traffic to reach Falmouth Hospital?

I referred to the Steamships Authorities, Falmouth/Woods Hole Noise and Traffic Working Group already. This working group was created by a previous section 15A report from a hearing like today. I'd like to take a minute to describe my participation

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in this Steamship Authority noise and traffic mitigation Working Group. I first applied to the Falmouth Select Board and was appointed as one of two seats to the working group. It's been hard to imagine a more frustrating experience. When I asked how professional traffic noise study might be conducted for the purposes of the working group's meeting its goals to mitigate noise and traffic, a \$2 phone app was proposed to measure noise.

The Steamship Authority has preferred to rely on anecdotal evidence submitted to a Steamship Authority email inbox by Falmouth residents rather than a fact-based professional noise and traffic study. How can a noise and traffic working group function without reliable baseline information on current conditions then begin to mitigate noise and traffic? My own emails to that Steamship inbox, which I continue to send are not always answered. Equally frustrating has been the fact that the Steamship has simply stopped convening this working group. We haven't met since November of last year. Again, this working group grew out of the findings of an earlier section 15A report.

I'd like to conclude with a brief set of comments on the current request for proposals, which the Steamship Authority committed to last year and it's section 15A report from last year's public hearing. That commitment was for establishing a third-party, off-Cape freight service to and from Martha's Vineyard. The laudable goal for this RFP is that the Steamship Authority take an active role in contributing to a more reliable and diversified marine highway in Southeastern Massachusetts, including the islands. Who can argue with that?

We've also compared the current RFP for off-Cape service issued a few months ago with the text of the RFP, the Steamship Authority issued almost 20 years ago. The texts are almost identical. Much of the language is verbatim the very same text from 20 years ago. At the same time, the Steamship Authority has said for at least a decade that the new Bedford freight experiment to the Vineyard 20 years ago was a failure and a money loser. Why would a very similar RFP today with many of the same conditions, not yield the same results. Briefly, my own criticism of the current RFP, number one, most problematic, in my view, is that automobiles are excluded as a possible category for freight carriers to and from off-Cape carriers to the Vineyard. I consider this a serious omission and could be decisive in determining whether a third-party carrier could make the freight route from off-Cape to the Vineyard profitable or not. What if an off-Cape freight carriers spare deck space and there's demand to take cars, for example, rental cars, drivers to and from the island, but it's not allowed by the Steamship Authority. Why ban automobiles?

Number two, on-demand service for freight is excluded as an option. What if a future bidder is targeting specific freight shippers who don't require a strictly scheduled ferry service? Why rule out an on-demand schedule from such proposals? Number three, some of the evaluation points in the RFPs evaluation rubric seem unreasonably difficult to meet. I think the steamship itself would have trouble today rating more than the lowest score and some of the evaluation categories of the current RFP.

In summary, in words, similar to those of Judge Cass 20 years ago who reviewed the Steamship Authority operations then for the governor's office, this RFP would appear to be designed to fail. In concluding, as I hope my comments have made clear, the Steamship Authority has repeatedly failed to meet its own commitments made in previous section 15A reports, and I fear a similar fate for section 15A report from today's public hearing.

Sean: Thank you, Nat. I will repeat my call if there are any elected officials in the audience who wish to speak. I can take you now. I saw Doug Brown come in. I don't know if he wants to speak, I know you have a conflict at six o'clock. Doug, if you do want to say anything, hit the "Raise Your Hand" icon and I will get you sooner rather than later. For now, I'm going to re-call on Kat whose last name I will--

Robert B. Davis: I think, Sean, Doug Brown, who's ready to speak.

Sean: Okay. All right, Kat. Sorry, I'm going to ask you to hold on one more minute. Thank you for your patience. I will bring Doug Brown over.

[pause 00:22:41]

Doug Brown: Hi, Sean. Thanks for having me on. I appreciate it. I wanted to remind the SSA that it's been, I think, three years now that the Select Board has sent letters to the Steamship Authority indicating request for ceasing the 5:30 **[inaudible 00:23:11]** your constraints. I think that there were some real good opportunities identified recently to shift the schedule around, and I hope you'll still consider that, and I'm looking forward to getting some freight service out of New Bedford as soon as possible. I appreciate the efforts on that regard as well. Just wanted to give you a reminder that we are still here and we still would like to see a way to get rid of that early boat if possible. Thank you for having me on. I appreciate it. I won't take too much time.

[pause 00:23:41]

Robert: You're muted, Sean.

Sean: Sorry. Kat, third time is the charm. You can start your video and unmute yourself if you wish.

Kat: Sure. Thank you so much. I don't know if this is the proper venue. I'm a Martha's Vineyard resident. I was just listening to NPR on my way home after waiting in standby at the steamship and I heard the NPRP saying this meeting was happening with folks on the Cape proposing or asking the steamship to consider banning standby seven days a week. I was coming standby because I had an emergency appointment with my dog that I had to go to the boring specialist with. This is many times that either a personally or human or animal emergency has come up, and I need to get off-island.

The next available return ferry to Martha's Vineyard that I had to schedule was on the 19th at 5:30 AM, everybody's favorite. I deeply empathize with the Falmouth residents, with the traffic and all of their concerns, these are valid and serious issues that do need to be addressed. I just also want to point out, first of all, I wish so many people weren't coming here as well, I'm with you on that, but if the Steamship is going to consider an all-out ban on standby, please only do it for people who are non-registered, island preferred members because to ban the rest of us from access to get back home, from an emergency or any other issue, I can't stay off-island for 11 days with my injured dog. It's just not fair or reasonable.

There are compromises that will have to be made on both sides as the cape and Island tourism continues to skyrocket at unsustainable rates. The Steamship will have to make accommodations, but I'm just urging folks to please remember, we live over here year-round, and we cannot just for a season to accommodate the traffic of tourists that a lot of us personally don't want to deal with either, we can't be banned from our home seven days a week for emergencies and other such things. That's my feedback. Thank you so much.

Sean: Thank you. Next, we'll take Jonathan Goldman.

[pause 00:26:22]

Jonathan Goldman: Thanks, Sean. Can you hear me?

Sean: Yes.

Jonathan: I think that what both Doug and Nat had said is very, very, very specific, and I think it's very, very, very important that there is a substantive response. This doesn't go into the suggestion box with the grinder, it just is addressed. I wanted to bring into that another personal point.

I have been on the road for the last six days, an exhausting drive down to DC for a memorial service. I came back up, and of course, was exhausted at the other end. While I'm not usually up at 4:30 or 5:30, because I wear earplugs, I was awoken and this is a couple of days ago. Every morning at 9:30 jake braking happens, the same time, probably the same truck and I have to say that these health-related things are essential to the health and well-being of both sides of the sound. I really think that any way that we can alleviate that is a helpful step. It's also a demonstration of the SSA's ability to actually listen, and to have a formative response for it.

I am dismayed by the last couple of decades of what's going on because it doesn't seem like there's any formative response because they're protected both legally and from the point of view of any commentary from the neighbors. I want to say that I don't live directly on the road, but like many other people, I live on a parallel road that's not 15 feet from Woods Hole Road, it's more like 200 feet, but if you think I can't hear it, even though the trees in the green time as opposed to the winter, you're wrong. I do hear it. We hear it all the time.

I will reiterate what I've said in the past. I convinced myself that it's a river, and I will tell people, "Oh, yes, the river is strong today. You can hear it." That gets on you after a while.

Now, years ago, we had a great meeting with the Cape Cod Commission at the Falmouth library as an attempt to try to have public interaction about this with a plan of how to be able to think about sustainability regarding the SSA and its impacts on the community and nothing ever came of that but I will say that the coming together of the community really unified as a voice as 160 petitioners have clearly said in the past, as well as here today, that the points that. The questions that Nat has asked are very pertinent, they need answers, and they need quantifiable fact-driven responses, not truckers that were there at that particular basement meeting at the Falmouth library that said, "Well, you knew what house you were buying and where it was." That's not the point at all. The point is civic responsibility by an organization on those that it directly influences. That is a huge problem. That's why we keep saying. Thank you for your time.

Sean: Thank you, Jonathan. Next, I will call on Damien Kuffler.

[pause 00:31:36]

Sean: Damian, you need to unmute.

Damien: Thank you very much.

?Speaker: Unmute Damian.

Damian: Am I audible now?

Sean: Yes, we can hear you.

Damian: Over the years, there've been a number of SSA board of governors meeting, point council meetings and public hearings. The former is supposed to give the public an opportunity to understand what the SSA is planning to do and provide the logic behind its decisions. The latter is supposed to allow the Steamship Authority to hear the ideas and complaints of the public with the public led to believe that the Steamship Authority would actually listen to what is said, seriously consider what was said, and to act accordingly to constructively address at least some of the public's concerns and wishes and to resolve their complaints.

However, what's actually happened was virtually none of these. First, the SSA board meetings virtually never addressed the logic behind its decisions, and people merely are told, the public is merely told what the Steamship Authority is going to do. For example, has never rationally explained why it was so urgent, if not, absolutely a requirement for it to have a 5:30 AM freight run out of Woods Hole, merely that it would start.

During and after the public meetings, the Steamship Authority has virtually never addressed or resolved any complaints listed by the public. For example, the devastating consequences, Jonathan and Nat mentioned of the 5:30 freight run on Cape residents. The serious safety issues called by trucks, speeding to reach the 5:30 AM freight run. It's boat scheduling and standi policies that cause massive traffic effects, backups.

Further, despite the many claims that the Steamship Authority has made that it will resolve these problems, no action has been taken. For example, the Steamship Authority has claimed that its personnel routinely monitor traffic for backups onto Woods Hole Road, as a means of resolving these backups. However, the monitoring has never resulted in any action to reduce or prevent the backups such as having personnel go to the sites of the backup direct traffic and to reduce snarls.

This is because the Steamship Authority claims that the backups are first not due to it. Second, that it has no authority to take such actions. Then why make the false claims? However, on the other hand, the Steamship Authority has never taken action such as to alert the plea and other public authorities about such problems in order to seek a resolution to these problems through the other public agencies.

The Steamship Authority's claimed it is concerned about speeding and air pollution caused by traffic. However, it is intentionally not taken any actions to reduce these problems and as Nat also mentioned, it has been delaying this whole process of the committee on which Nat sits because it appears not to be truly interested in resolving problems.

The Steamship Authority also claims there is no funds with which to support the mitigation of problems. Nevertheless, it spends more than \$1 million on needless advertising to get more vehicles and passengers to use its already overtaxed overbooked services. That million dollars could easily be spent to resolve most of the problems caused directly by the Steamship Authority.

An additional problem is that regardless of what the Steamship Authority claims, it is impossible to believe anything that the Steamship Authority says that the public would like to hear. For example, the Steamship Authority claimed that the 5:30 freight run was only a test and promised to eliminate the run if there was a public outcry. There was a massive and ongoing public outcry, but the Steamship Authority continues to refuse to cancel the run.

The Steamship Authority promised that its newly constructed third slip would only be used for overnighting and emergencies are never used for regular freight service. The third slip is now routinely used for service. The Steamship Authority also claimed that it's working at full capacity and therefore could not delay the 5:30 freight run because there was no possibility of fitting the freight run into possible slots.

However, over the years, the Steamship Authority has ever increased its number of boats that is thus the Steamship Authority has always known it had the capacity to shift and readjust schedules and could have the freight run 5:30 run later. However,

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the Steamship Authority appears to and indicates by its new schedule that the 5:30 run is permanent no matter what the outcry.

Although the Steamship Authority has claimed that is operating, as I just said, at full capacity and could not operate additional runs in the schedule, nevertheless, even as of this week, it operated "unscheduled runs" that are not in the published schedule. Thus, the Steamship Authority has always known it can add additional runs if and when it wants.

The very fact the Steamship Authority now claims it has the right to add unscheduled runs if and when it wants has a terrifying implication. This is that the right-- The steamship Authority claims it has the right to add additional runs if and when it wants anytime, thus, what is to prevent the Steamship Authority from running unscheduled, but regular and routine midnight runs? What about an unscheduled regular 4:00 AM run?

What about the Steamship Authority deciding that the mandate to mean the lifeline to the Vineyard requires operating 24/7? It's going to do what it wants because it has the right to do what it wants, right? Its own claims. What is to stop any of this to happen? Clearly, the Steamship Authority has shown no interest in addressing these questions or calming the concerns of the residents and others who pass through this beautiful area.

Without giving any evidence the Steamship Authority claimed it required to move forward and build a massive ticketing building, which is strongly opposed by local national and international communities. It has also claimed that it was impossible to make anything but cosmetic changes to the design. The Steamship Authority makes these claims but has never justified. Further, without showing any respect for the interests and desires of anyone outside the Steamship Authority, it is always, therefore, trying to force its desires on anyone else and shows no respect or interest in the concerns and pains suffered by others.

Without giving any evidence, the Steamship Authority claimed that state and federal regulations required it to move forward and construct the new ticketing building and that no construction delays were possible without dire consequences to the Steamship Authority. Even though the deadline has long passed and the construction has not started, where are these adverse consequences that they were threatening? They were trying to force the construction of the building down our throats.

There it's clear that the Steamship Authority was lying and has been lying all the time. Again, it shows that the Steamship Authority merely wants to do what it wants to hell with anybody else. Plus this public has experienced nothing but blindness and deafness from the Steamship Authority in regard to public input.

The Steamship Authority has never acted in good faith and done nothing but obstruct progress and done nothing that might show social consciousness, a moral compass, social or financial integrity, or any sense of morality. The Steamship Authority has

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provided us nothing but lies. The public has heard nothing but lies from the Steamship and received nothing from the Steamship Authority, but complete disdain for anything except what its narrow-minded leadership wants it to do, which is always in its own self-interest regardless of the damage it does to the local and wider communities, as well as our environment.

In conclusion, when will the Steamship Authority join a moral society, stop lying, act with integrity and for the betterment of the local and world communities and stop acting in only its own self-interest? I ask you to please listen to those from the outside who do have a moral compass and are interested in the benefits about the Steamship Authority, those on the Vineyard, and our local and international community and brethren. Although it might not be the legal authority for the Steamship to listen to us, it has the moral obligation to enlist us and act positively, instruct, and constructively for the betterment of all. Good evening.

Sean: Thank you, Damien. Next, I will call on Ed DeWitt.

[pause 00:41:10]

Sean: Maybe, there it is.

Edward DeWitt: Good evening. Thank you for listening to my testimony. I'm Ed DeWitt, I'm a former Falmouth representative to the Steamship Authority and I'm the current chairman of the Falmouth Transportation Committee. I'm speaking here as a resident of Falmouth, who's impacted by Steamship Authority operations on a daily basis. I live right off the corridor near Watson's Corner, a significant choke point and hazard largely created by Steamship Authority-bound trucks.

The Steamship Authority is charged in its enabling act to provide adequate transportation of persons the necessities of life for the islands of Nantucket and Martha's Vineyard. Adequate has been defined by courts and agencies as minimally sufficient to accomplish the purpose for which something is intended and to such a degree that no unreasonable risk to health and safety, as well as it not being offensive to community standards.

Not only is the proposed schedule in attendant changes far beyond minimally sufficient to accomplish the purpose of the authority, the schedule poses risks to health safety and is extremely offensive to community standards. Most importantly, reasonable and economically viable solutions and alternatives are available specifically in New Bedford.

Necessaries of life has been defined by courts and agencies as those things necessary to preserve life such as food, shelter, medical attention, and protection from harm. Pulling trash away from the island is not necessities-of-life activity has demonstrated by Nantucket. Hauling landscapers and their equipment back and forth on a daily basis is not a necessities-of-life activity. Hauling empty trucks is never a necessities-of-life activity. Tourist buses or not necessities of life. Hauling rental cars back and forth is not a necessities-of-life activity. Hauling non-resident vehicles

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are not necessities of life. In short, most of what the Steamship Authority is hauling has nothing to do with necessities of life.

The proposed schedule reinforces and expands the public nuisance the Steamship Authority has already created. Please see the public nuisance complaint filed in January on behalf of the Southeast Massachusetts Regional Transportation or SMART Citizens Task Force. I've submitted a written copy of that for the record. More than 20 years ago, the Governor's New Bedford, Cape and Islands Ferry Service Task Force identified suitable schedule level into and out of Woods Hole is equivalent to the 1995 volumes. I've also submitted a written copy of that report as part of my testimony.

The report notes a promise and commitment by the Steamship Authority to reduce cars to 1995 levels. Instead, the Steamship Authority has expanded the schedule to include [unintelligible 00:44:37] freight operations, added a fully operational ferry slip in New Bedford, expanded ferry vessel carrying capacity, and greatly expanded community outrage.

It's time for the Steamship Authority to acknowledge its negative impact on this community and to live up to promises they'd made to Judge Kass and the Task Force. It is time to operate a schedule that satisfies the purpose of the authority to provide adequate transportation of persons and necessities of life.

In your section 15A findings, you need to address the following; how the schedule does not exceed your limited statutory authority to provide adequate transportation of persons the necessities of life for the island of Martha's Vineyard, in particular, how the 5:30 AM freight boat is necessary to provide necessities of life to the island, and it was not simply added for the convenience of truckers, why the promise made to the New Bedford and Cape and Island's Ferry Service Task Force to limit capacity to 1995 levels was broken and remains broken.

Clearly define your mission to provide adequate transportation of persons the necessities of life for the islands of Nantucket and Martha's Vineyard. Explain how standby particularly for non-residents fulfills your mission. Explain why it has taken 20 years to formulate an RFP for off Cape Vineyard freight service and it took only two months to draft, post, and award of license for freight service between New Bedford and Nantucket. Thank you again for your attention. I look forward to your section 15A report.

Sean: Thank you, Ed. Next, I will call on Kristen Alexander.

Kristen Alexander: Hi, sorry about that. It took me a second. I just want to agree with Mr. Trumbull and Slackman Brown and asking if we're going to get a response from the SSA about the early morning run and also about the impact on people who live in Falmouth and Woods Hole. I also wanted to add that I'm concerned not only about the school buses but just about people trying to pull out of their side streets into the main traffic. It's really obvious when the Steamship lets out, you wait until it's gone, and then you pull out, wait for the bus and then you pull out.

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I have a friend who comes off-island all the time and goes to the hospital. Today I had to go to the hospital. I was in that traffic. I didn't get to wear my bracelet to get on the boat. [chuckles] I had to wait through the traffic. I would like to know if the Steamship is going to take any responsibility for traffic that comes from their operations and goes through the main streets in Falmouth.

In the past, they've washed their hands of it once it leaves the street down by the boat. I don't think that's right. For all of us who have to pull in and out of that traffic, risk our lives, literally risk our lives, pulling out into that traffic because there's no way to tell if there's a truck coming around the corner too fast. I'm sure that for the people who live on the Vineyard, my friend was able to get on a four o'clock or 4:45, or whatever it was, freight boat, showing her hospital bracelet. I'm sure that's not going to be a concern for island residents.

The Steamship's going to take care of-- It's the lifeline to the Vineyard. They're going to take care of the people who live there. At the same time, you have to think about the people on this end and what health impacts are affecting us. It's irresponsible not to. I would like to hear some answers from the questions from Trumbull and Brown. Thank you.

Sean: Thank you, Ms. Alexander. Next, I will call on Stephen Laster.

Stephen Laster: Can you hear me?

Sean: Yes.

Stephen Laster: Thank you. Thank you for allowing me to speak. I would thank you for holding this hearing, but I think it's very sad we're having it today. I hold you fully responsible for what some would jokingly call Groundhog Day. Once a year, we get together. I think Zoom has been a very effective medium for you to limit engagement. You sit there patiently, taking notes, occasionally multitasking, checking cell phones, looking at other browser windows, I'm sure counting down for the minutes of this hearing to end. It's frustrating.

You've heard from some very eloquent, very fair-minded, very reasonable civic leaders working on traffic, dedicating their life to being a select person, trying to make the town of Falmouth a better place to live. You hold in your hands the very future of the Steamship, surely a public good and arguably managed as a private playground by you and your decisions.

You see the very conventions you find in your 15A reports are without data, unsupported by facts, and frankly hard to understand if we attribute good motive to management, which I would like to do. You see I believe all people come to their jobs and their profession is, to be honest, hard-working good people, and that's why it is so difficult to reconcile your actions with those ideals.

In private enterprise today, good companies are measured on six attributes. What is the quality of their service? As one who was in the **[unintelligible 00:51:38]**

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Channel, early morning just a few weeks ago, and one who is a coast guard licensed captain, I watched your vessel hit the oceanographic dock. It almost hit my vessel, slipped three as a clear and present danger and a broken promise, and an early morning run that's unnecessary.

Your cancellations, your ship breakdowns, the fact that you're running vessels that are at or beyond the end of life doesn't speak highly for quality of service. Cost management is another measure. The ever-growing shoreside facilities that, are by choice and not by necessity, are bewildering. Your debt load is so high right now you can't keep up with vessel replacement. Your debt load is so high right now you can't use sustainable vehicles because you can't afford them, and yet you have buildings that are unnecessary for the delivery of your basic service.

Those costs are stealing from practical solutions that would limit the pressure on the port of Woods Hole, and yet you chose to spend your money on canopies that don't shed rain, and on a terminal building that is unnecessarily large, when in fact those funds can be diverted to solving real problems, to lowering ticket prices and paying employees a fair wage, none of which you're able to do, which gets to employee satisfaction and which is why I hear you're struggling to fill roles. It's not a surprise.

In this economy, employees are voting to work for employers who care. Many of your employees, having firsthand spoken to them, feel badly about the relationship between the Steamship and the town of Falmouth, and that relationship could be a harmonious relationship if only we could hear each other and if only you would take rational action. A very common measure these days looks at the ability of the organization to manage its operations environmentally, sustainability, and with good governance, and all of these measures, you are behind if not failing.

The last one is the most atrocious and the most disconcerting, it's about good governance. Unfortunately, through the Zoom mechanism, not really a necessity, we could have met face to face, it was your choice, we can't have two discourse. You can't feel the emotion of the people of Falmouth. We can't truly engage. You will sit, take notes, and pass the time.

I can't articulate as clearly as my fellow citizens did the true negative health impacts your decisions have on us.

My house has been on the Woods Hole Road since before any of you were born. Contrary to beliefs, I didn't buy a house next to an airport as some of your more snarky contributors might say. I bought my house knowing that I lived in the Woods Hole Road some 30 years ago knowing the Steamship Authority was there, and as others have said perfectly, at peace and a big supporter of the Steamship. I grew up as a child, frankly loving the ferries, someday hope to captain one. Today every time on the water, when I see a ferry, I see mismanagement, I see blatant disregard for the welfare of the people of Woods Hole, and I see a lost opportunity, and it's sad.

In your 15A report I hope you will speak to, as others have said, the clear and present health risks, the 5:30 and the overcrowding of Woods Hole with freight

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trucks, creates. I hope you will speak to the true other options you have for reducing the pressure of the terminal and provide a cost-benefit analysis that includes health impact, and how you came to your decision in both economic and financial detail. You owe that transparency to the people you serve.

Mostly, I hope you will find in your hearts a real solution. The more you harden your position, the more we will fight you. I promise you that. You may have many of the cards today but in fact, by your past action, you are simply building the case to redo the Enabling Act, to change the governance, to return the Steamship back to an organization that works on behalf of the people. Please don't force that. Please do the right thing.

We want the Steamship as a good neighbor. It serves a vital purpose. It used to be a majestic institution, and somewhere along the way, it's lost its course, and it's in a fog of antagonism on outdated ships with outdated policies. Let's work together and fix that. I do not want to meet again next year. Thank you.

Sean: Thank you, Stephen. Next, I will call on one of the [unintelligible 00:57:06]. Hello.

Participant 5: Walt, can you hear me?

Sean: Yes.

Participant 5: I just want to reiterate this little charade's has been going on for three years. You all are very polite to us and listen very carefully, and I would bet that you agreed before this meeting that the 5:30 boat is going ahead full speed. Let them get their ya-yas out and things will never change. I hope that isn't true. Thank you.

Sean: Thank you. Next, I will call on Phillip Logan.

Phillip Logan: Thank you. Sorry to hold you up. Can you hear me now?

Sean: Yes, thank you.

Phillip: I wanted to follow up Matt Trumbull's comments about the RFP has been issued for, in the record at least, purposes of relieving some of the traffic pressure in Woods Hole. Although I have yet to really identify an objective function for the RFP other than to say that the Steamship Authority is doing something for the people of Woods Hole as long as it doesn't bother the people in the Vineyard. That's the best I can come up with so far.

Anyway, my complaint has to do with two things. One is that I assume that the final decision for the RFP, and there'll be a lot of backing and forthing, of course, will end up being made by the two [unintelligible 00:59:33] representatives with 70% of the vote. I'd like to be corrected if that's not the case, but I believe that is the case.

I'd like to compliment the RFP for, at least, inviting many different methods of transporting things back and forth from different towns. I would hope that the RFP would allow for more than one arrangement, more than one transporter, more than one contractor, if they, in fact, have a reasonable bids from a variety of different kinds of people who can do different things. That would be wonderful.

My principal complaint though, is that we've set the bidders up to name their own price for the service they want to provide to the shippers for example. They'll look in comparison to what the Steamship Authority offers them, which is what they call a closer port from Woods Hole, rates that reflect the subsidy that the state has provided for the Steamship and the fact that they don't pay any taxes. I can go on and on about that.

Anyway, it's a very difficult comparison to have a bidder who also has to keep all the current constituents of the SSA happy, make a profit, pay the SSA for services that it's going to provide, and also establish this land-side site for getting this thing going. Is there anything else we can possibly burden them with?

More serious, my major criticism is that the SSA has removed itself from the ability to underwrite this service. If they are really serious about this service getting going, they would contract for that service from different providers, and they would then set the rates, pay the providers to provide the service and the SSA set the rates. The SSA has many more abilities, to underwrite a service such as this and pass those costs around throughout its entire system.

All of the studies that were done since 1990, looking at the prospects for sourcing north and west of New Bedford and shipping out of New Bedford, all mentioned the fact that it would be a real go, or at least a real good starter, if the rates set by the Steamship out of New Bedford were the same as those out of Woods Hole. Given this RFP, the Steamship has removed itself from its ability to do that, unless it wants to, on the side, arranged to underwriting, but that's not apparent in the RFP. That's the end of my criticism. Thank you.

Sean: Thank you. Next, someone from the Woods Hole Film Festival.

[pause 01:03:10]

Sean: Maybe. Let me try that again.

[pause 01:03:35]

Sean: Hello.

Judy Laster: Are you there?

Sean: Yes.

Judy: This is Judy Laster. I'm here in my personal capacity, not as a representative of the Woods Hole Film Festival. It is with great sadness that we're, again, here talking about the same issues that we've talked to you and probably not really with you about for the past, at least four or five years. The fact that we are here, I think, speaks to the issue that, in my mind, is the most important one, which is credibility of process.

I have no idea what your process is for anything that you decide other than deciding you want to do something and making it happen. Accountability seems to be only to those who will ensure that you get what you want and not to the communities that you serve. In my opinion, that is the first thing that needs to change. You need to think about what you're doing in relationship to the communities that you serve, not just constituencies who pay your bills. The communities pay your bills as well. The Commonwealth underwrites you in times of financial distress.

There are many issues that need to be resolved beyond the 5:30 freight run, and unfortunately, I think it's come to the point where these hearings, while they may be good-show hearings, are useless. I would to request to any public official who may be on this or that you request that the legislature hold hearings on this and that you all testify under oath because the fact that this hearing happens like this is insulting an objection of all the fact that we can't see who's on here.

The fact that you're hiding behind this format, I think is a big problem. You need to be in this community. You need to care about this community and you don't, which is too bad. Just to talk about the 5:30 AM truck run, the freight run, the traffic starts at 3:00 AM. I know because it wakes me up every single day. I'm exhausted, listening to the huge trucks that go by, You could clearly do something about that and you choose not to.

There's no rational reason why you cannot implement the recommendations of the Falmouth Transportation Committee, of the Falmouth Selectmen, of anybody. If you had, at one point, pushed your freight run back to a reasonable time of day, it is likely that people would think that the Steamship is operating in good faith, and that we would work with you to address, collaboratively some of the other issues that are clearly problems for you like your financial issues that we've read about recently, the fact that you have no money to replace the ships that are in fact, the lifeline to Martha's Vineyard. If I lived in Martha's Vineyard, I would be very concerned about that.

The fact that you have recently stated that your bonding capacity is inadequate for ship replacement and that you will be getting that funding from ticket sales, possibly from communities, I have no idea, I think you have no idea, if I were running an organization that had that kind of problem, I would be in an emergency capacity trying to figure out the financial plan for keeping your operations going. The fact that we haven't heard anything about that, I consider that problematic.

In whatever hearing that happens, where you testify under oath, I think that you need to provide the people of the Commonwealth with all relevant information about your operations and what your plans are to get yourselves out of the quagmire that you are in right now.

Personally, I have no confidence that you are going to do anything to address the concerns of the people in Falmouth that we've been talking about for the past few years, which is too bad, because those are just window dressing. Had you had the good sense to do that, it's possible that we would not be here every year having the same conversation.

I wonder what you are so concerned about in terms of changing the authorizing authority for the Steamship. Why was it so objectionable to have term limits on your board? That seems to me just the minimum standard for good governance, yet I'm sure you spent money on lobbyists, I'm sure you've spent money on communications people to fight that. If you're fighting basic good governance, what else are you spending money on through lobbyists to fight?

I would like a public-records request for any and all documents related to communications and deliberations both internally and with external parties regarding your decisions about the annual schedule. I would also like to issue public-records request for any deliberations that you've had already about the schedule beyond 2023. I want to know if and when you actually hire a chief operating officer, what that person's role will be in determining the schedule.

Another issue, I think that Nat brought up earlier, but I think which really is an even bigger problem is the fact that you are creating a public health hazard, not just to the residents of Falmouth, but to anyone who breathes the air and uses the waters in this area. In the time that I've lived here, which is very, very many years, the particulate that I see that comes from both truck traffic, and I would imagine the Steamship I'm sure violates the clean air standards that you are required to operate under. I would also imagine that you probably violate clean water laws as well.

I would like to have a public-records request for any and all documents and communications related to your deliberations, both internal and external, regarding compliance with any and all state and federal clean air standards and clean water standards and any enforcement actions that you've been subject to. I would like you to make that available, not just to me, but to everybody who is at this hearing and to share it with all of the public officials who are in your jurisdictional area.

It is, as other people have said, unfortunate, that we are coming to the point where we can't trust anything that the Steamship is telling us as having any sort of veracity. I don't know why that is. It would be much easier for you if you would work with us. Issues like electric vehicles, electric boats, reducing air pollution, reducing traffic, they are all interrelated. You're going to have to do it at some point. The longer you wait, the more expensive it's going to be and the more difficult it will be for the people in the communities that you're supposed to serve on the Vineyard, on Nantucket. I

would really hope that your governing body is pushing you to look at all these matters.

This stems from the 5:30 AM freight run, and the fact that you have been unwilling to do anything, to mitigate the impact of the ever-increasing truck traffic that you are creating in not only our community but all the communities that these trucks come through on Cape Cod. I really hope, as other people have said that we're not here next year. Is this a good use of my time? I highly doubt it. The reason that I am here though, is because I hope someday you will actually hear us, listen to us, and do something about it. The fact that this hearing is being conducted in an insulting manner, I would also hope it will change in the future as well. Thank you.

Sean: All right. Sorry. I don't have any other hands raised. Oh, wait, two popped. All right. A couple of popping up now. Becky Connors?

Becky Connors: Hello. Thank you for giving me the chance to speak. Can everybody hear me and see me okay? Once again, I'm speaking as a business owner and as a resident of Woods Hole. As Nat had said earlier, some people live very close to the road. I'm one of those people. I live about 20 feet off of Woods Hole Road, and my business is also about 100 feet off of Woods Hole Road. My business is a motel that has 20 people, 20 rooms, right on Woods Hole Road. My guests are woken up starting at about four o'clock in the morning every day as trucks queue up to get down to the 5:30 boat.

I've mentioned this before in prior meetings, but I want to put a face to, a lot of people keep saying the people of Woods Hole, the people that live on Woods Hole Road. I want to put a face to that, and a face to the businesses that also are impacted by this 5:30 boat and the massive amount of traffic that is constantly funneling into Woods Hole. I have risked my life many times as I cross the street and trucks barrel either from the Steamship away or to the Steamship to make the boat. It is a very incredibly dangerous road to cross, which I have to do at least four times a day for my job.

Please help us in Woods Hole with this traffic situation, whether it's the Steamship hiring consultants to do a traffic study, to see how we can mitigate this before somebody dies on this road because the traffic rushing off those boats and to those boats is going to kill somebody someday. I really hope it's not me or somebody in the village. Thank you for your time. I don't want to beleaguer this point, but I would appreciate your consideration into all of these points. Thank you.

Sean: Thanks, Becky. I will call on Myla, whose last name I'm not going to try to pronounce because I will butcher it.

Myla: Can you hear me?

Sean: Yes.

Myla: I didn't realize I was going to be the last person to speak. I think that everybody has spoken so incredibly, eloquently, passionately, knowledgeably, and I don't think that I can possibly rise to that level. I want to just say I am another witness. I've been a Woods Hole resident in the summers and, at times, during the year for many, many, many years, and I have seen, and I can hear in this meeting, the incredible level of frustration that people feel and powerlessness. Truly, I don't know what is going to be needed to get a response from you, folks, but a response is absolutely needed. It just can't go on like this. I think people have reached their limit.

That's all I want to say, just basically to bear witness to this tremendous outpouring of around this issue, which is really plaguing the Falmouth and Woods Hole communities and the powerlessness that people have lived with for so many years. Don't just take it to heart, take it into action. That's what I want to leave you with. Find some really, truly changing ways to change the way things have been. I don't know what it's going to take, but something has got to give. That's all I have to say.

Sean: Thank you. I have Bonnie Simon.

Bonnie Simon: Can you now hear me?

Sean: Yes.

Bonnie: I was sent a video of the truck traffic at 4:30 or 5:00 AM. I must say, in that minute and a half, seeing those trucks come down Woods Hole Road, defied anything that I have ever imagined. I have come to these, been part of these hearings for years, but to see that video, I hope that it actually is entered into the minutes of this meeting because I think everyone would be shocked to see truck, after truck, after truck. No cars, just trucks, trucks, trucks going down Woods Hole Road at that hour of the morning in the dark. I simply request that everyone have the opportunity to see that. Thank you.

Sean: Thank you. I don't have any other hands raised. Terry, Bob, I think it's back to you.

Bob: Thank you everyone for the testimony, and if anyone has any written testimony they can submit it to schedules@steamshipauthority.com.

Terry: Right.

Sean: Okay. All right. Thank you.

Terry: Okay. [unintelligible 01:19:39]

[01:19:44] [END OF AUDIO]

APPENDIX C



Town of Tisbury
Office of the Select Board
51 Spring Street, P.O. Box 1239
Vineyard Haven, MA 02568
(Tel. 508-696-4201)

April 29, 2022

Woods Hole, Martha's Vineyard, and
Nantucket Steamship Authority Board
P.O. Box 284
Woods Hole, MA 02543

Reduction in Service to the Island of Martha's Vineyard

Dear Members of the Board:

The Tisbury Select Board adamantly oppose the elimination of the 5:30 a.m. ferry service to the island.

The Town of Tisbury is the year-round port for the Island of Martha's Vineyard for the transit of passengers, freight, and vehicles. Our residents, businesses and daily commuters rely on the early morning boats for our workforce, daily deliveries and to meet medical appointments off island. Eliminating or reducing the morning ferry service from and to Woods Hole, and specifically the 5:30 a.m. ferry service to the island, will have a substantial adverse impact on the island. The reduction in ferry service will increase traffic congestion on island, impede public transit service provided by the Vineyard Transportation Authority and unnecessarily prevent the smooth and timely flow of goods and services to the island.

The Steamship Authority provides an essential service for the island towns. This essential service cannot be met with an elimination or reduction in service. We believe the current schedule for ferry service provided by the Steamship Authority is just meeting the minimum needs of the island.

Sincerely,

John W. Grande,
Tisbury Town Administrator

Cc. Robert B. Davis, General Manager
John Cahill, Port Council Chairman



April 29, 2022

To: Robert Davis,

As the CEO of Martha's Vineyard Hospital (MVH) and Windemere Nursing and Rehabilitation Hospital (WNR), I am once again writing this letter of concern regarding the recent discussions to discontinue the 5:30 a.m. ferry from Woods Hole to Vineyard Haven.

Together, MVH and WNR, is the largest employer on Martha's Vineyard and serves year-round Islanders, seasonal residents, short term vacationers, day trippers and tourists from around the world. We are a 24/7, 365-day operation, 7 miles out to sea with the SSA being an essential lifeline to key resources not available on an Island of our scale. The SSA serves as an essential transport system for direct caregivers, some of whom live on the Cape and further out, who provide routine, emergency, and specialty services to Island residents and visitors who need them, when they need them. Many caregiver shifts begin at 7 a.m. Arriving in Vineyard Haven at 6:15 then traveling to the Hospital gets them to their departments just in time. This includes respiratory therapists; nurses from Falmouth, Woods Hole and other parts of the Cape; physicians; case managers; chefs who prepare meals on wheels for Island Elders; and, specialty equipment and technologists for specialized radiological testing.

The 5:30 a.m. ferry is essential to our core supply chain needs like food, linen, medical supplies, and specialty pharmaceuticals. These needs have been exacerbated by the pandemic; shortages of key supplies require us to order smaller shipments more frequently. As importantly, it is also an essential time for tradesmen to travel for services critical to the maintenance of our large campus-electricians; plumbers; HVAC contractors; biomedical engineers and the like, to arrive, perform needed services and to return to the mainland. Beginning early means these contractors can maximize their productivity in a day, avoid costly lodging expenses, and keep us up and running to serve the community when something breaks unexpectedly.

To assume this level of daily need can simply be moved to a later ferry is impractical especially "in season" when the ferry schedules fill quickly. It would disrupt our delivery of patient care; create a hardship to our employees who commute; negatively impact our daily supply chain requirements; and, further exacerbate traffic and congestion patterns creating a predictable, negative (and avoidable) domino effect on the Island and in Woods Hole during early commuter hours.

With this in mind, I urge the SSA to continue the 5:30 a.m. service from WH to VH without interruption.

Very sincerely yours,

Denise Schepici MPH
President & CEO
Martha's Vineyard Hospital | Windemere Nursing and Rehabilitation Center
dschepici1@partners.org
Office 508- 957- 9558

Terence Kenneally

From: Moran, Susan (SEN) <Susan.Moran@masenate.gov>
Sent: Friday, June 3, 2022 5:15 PM
To: schedules
Cc: Kaplan, Benjamin (SEN)
Subject: Senator Moran Testimony - Steamship Authority impacts on Falmouth and Woods Hole
Attachments: 06.03.22.Steamship Authority 2023 Operating Schedule Letter (Senator Moran).pdf

Dear Mr. Davis,

I have attached testimony to be submitted into public record for the upcoming public hearing on proposed schedule changes. Please let me know if you have any questions.

Sincerely,

Susan L. Moran
State Senator
Plymouth and Barnstable

Checkout my [Website](#)
[Facebook](#) | [Twitter](#) | [Instagram](#)



The Commonwealth of Massachusetts
MASSACHUSETTS SENATE

STATE HOUSE
BOSTON, MA 02133-1053
TEL: (617) 722-1330
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June 3, 2022

Mr. Robert B. Davis
General Manager, Steamship Authority
228 Palmer Avenue, Falmouth, Massachusetts 02540

RE: Steamship Authority 2023 Operating Schedule

Dear General Manager Davis,

Thank you for the opportunity to submit written comment on the Authority's proposed changes for operating in 2023. The Authority's continued partnership with the Legislature to ensure access to this critical transit service for the Cape and Islands is appreciated. I write today to elevate the concerns that have been raised to me by residents and local officials regarding the lack of public oversight for the Authority's decision-making process, specifically as it relates to the scheduling of the 5:30 AM early morning freight from Woods Hole to Martha's Vineyard and the clear discounting of local input.

As you are likely aware, there are potential risks to quality of life and public safety for the Falmouth and Woods Hole communities with the implementation of this additional freight. Noise levels and increased freight truck traffic have been sighted as frequent disturbances in residential areas. I request that the Authority respond directly to these points at the upcoming public hearing, as well as the additional items outlined in the recent letter from the Falmouth Select Board, submitted in conjunction with the Falmouth Transportation Committee's recommendations. The Town would welcome your insight on the department's efforts to mitigate impacts for residents.

Additionally, I am discouraged by the Authority's lack of outreach to mainland communities throughout this determination. As I have advocated for previously, consensus-building is a necessary component of the decision-making process and communities like Falmouth and surrounding towns are frequently left out of these conversations.

I hope that the Authority will strongly re-consider the scheduling proposal, and I look forward to your response.

Sincerely,

A handwritten signature in blue ink, appearing to read "Susan L. Moran", is written in a cursive style.

Susan L. Moran
State Senator
Plymouth & Barnstable

Terence Kenneally

From: Hap [REDACTED]
Sent: Wednesday, June 8, 2022 7:18 AM
To: schedules
Subject: Woods Hole to MV May 18, 2023, through January 3, 2024 schedule

I am writing to express my dissent with the proposed May 18, 2023, through January 3, 2024 Woods Hole to Martha's Vineyard ferry schedule.

I am a resident of Falmouth who lives in a neighborhood along Woods Hole Rd and we continually hear truck tractor trailer traffic early every morning, 5 AM, when there are 5:30 AM departure trips from Woods Hole to Martha's Vineyard. The trucks "jack brakes" or exhaust brakes are very loud. It's amazing that they have to use their brakes so often when they are still several miles from Woods Hole! but they do and they are very loud.

I respectfully request, as others have requested in the past, that the 5:30 AM trip be moved to later in the morning or do not allow loud tractor trailer type vehicles to use that early morning ferry. I understand the Vineyard requires services but they should not be at the expense of their neighboring towns. I've heard that the larger trucks are required for keeping shipping costs down and that because they are so big they can not arrive in Vineyard Haven later in the morning because traffic is so dense that they can not maneuver in the streets! If that is true then smaller trucks should be used or the Vineyard should widen their roads to accomodate the trucks they supposedly require.

Please honor many Falmouth residents request to change the ferry schedule so Falmouth residents don't bear the burden of extremely loud truck noise early in the morning.

Thank you
Robert Garritt
Riddle Hill Rd
Falmouth, MA

Terence Kenneally

From: EDWARD DEWITT [REDACTED]
Sent: Wednesday, June 8, 2022 4:57 PM
To: schedules
Subject: Written Testimony
Attachments: Schedule statement.docx; 2001-task-force-report.pdf; Letter of Public Nuisance Complaint to Attorney General Healey from SMART Citizens Task Force 5January2022.pdf

Please see attached statement with attachments for consideration at the Section 15A public hearing. Thank you.

Edward J. DeWitt
116 Pin Oak Way
Falmouth, MA 02540

Written statement by Edward DeWitt

Steamship Authority Schedule Hearing June 8, 2023

I am a resident of Falmouth and I am impacted by Steamship Authority operations on a daily basis. I live right off the corridor and near Watson's Corner, a significant choke point and hazard.

The Steamship Authority is charged in its Enabling Act "to provide adequate transportation of persons and necessities of life for the islands of Nantucket and Martha's Vineyard . . ." Section 1.

Adequate has been defined by courts and agencies as minimally sufficient to accomplish the purpose for which something is intended and to such a degree that no unreasonable risk to health and safety, as well it is not offensive to community standards. Not only is the proposed schedule and attendant changes far beyond minimally sufficient to accomplish the purpose of the Authority, the schedule poses risks to health, safety and is extremely offensive to community standards. Most importantly reasonable and economically viable solutions and alternatives are available.

Necessaries of life has been defined by courts and agencies as those things necessary to preserve life such as food, shelter, medical attention and protection from harm. Hauling trash away from the island is not a necessities of life activity as demonstrated by Nantucket. Hauling landscapers and their equipment back and forth on a daily basis is not a necessities of life activity. Hauling empty trucks is never a necessities of life activity. Tourist buses are not necessities of life. Hauling rental cars back and forth is not a necessities of life activity. Hauling non-resident vehicles are not necessities of life – in short most of what the Steamship Authority is hauling has nothing to do with necessities of life.

The proposed schedule reinforces and expands the public nuisance the Steamship Authority has already created. Please see the public nuisance complaint filed in January on behalf of the Southeast Massachusetts Regional Transportation (SMART) citizens task force (copy attached).

More than 20 years ago the Governor's New Bedford, Cape and Islands Ferry Service Task Force identified a suitable schedule level into and out of Woods Hole as equivalent to the 1995 volumes (copy of report attached). The report notes a promise and commitment by the Steamship Authority to reduce cars to 1995 levels. Instead, the Steamship Authority has expanded the schedule to include pre-dawn freight operations, added a fully operational ferry slips in Woods Hole, expanded ferry vessel carrying capacity and greatly expanded community outrage.

It is time for the Steamship Authority to acknowledge its negative impacts on this community and live up to the promises it made to Judge Kass and the task force. It is time to operate a schedule that satisfies the purpose of the Authority to provide adequate transportation of persons and necessities of life.

In your section 15A findings you need to address the following:

How the schedule does not exceed your limited statutory authority to provide adequate transportation of persons and necessities of life for the island of Martha's Vineyard.

In particular, how the 5:30 AM freight boat is necessary to provide necessities of life to the island and was not simply added for the convenience of truckers.

Why the promise made to New Bedford and Cape and Islands Ferry Service Task Force to limit capacity to 1995 levels was broken and remains broken.

Clearly define your mission to provide adequate transportation of persons and necessaries of life for the islands of Nantucket and Martha's Vineyard.

Explain how standby particularly for nonresidents fulfills your mission.

Explain why it has taken 20 years to formulate an RFP for an off-Cape - Vineyard freight service and it took only 2 months to draft, post and award a license for freight service between New Bedford and Nantucket.

Thank you.

Edward J. DeWitt
116 Pin Oak Way
Falmouth, MA 02540

attachments



The Honorable Maura Healey
Attorney General of Massachusetts
One Ashburton Place – 20th Floor
Boston, MA 02108
ago@state.ma.us (*submitted via email and first class mail*)

January 5, 2022

**Re: Public Nuisance Complaint
Woods Hole, Martha's Vineyard and Nantucket
Steamship Authority**

Dear Attorney General Healey,

The Southeast Massachusetts Regional Transportation (SMART) Citizens Task Force respectfully requests that the Attorney General exercise her authority to mitigate or eliminate an ongoing public nuisance caused by the Woods Hole, Martha's Vineyard and Nantucket Steamship Authority (hereinafter SSA).

The SSA is empowered by legislation “to provide **adequate** transportation of persons and necessities of life for the islands of Nantucket and Martha’s Vineyard.” (Ch. 701 of the Acts of 1960 as amended; emphasis added.) The SSA has greatly exceeded its charge of providing adequate service for the necessities of life and in so doing has created and maintains a public nuisance within and beyond the Town of Falmouth.

SMART Citizens Task Force is an informal advocacy group with a membership of approximately 500 taxpayers who are residents of the Cape and Islands and the South Coast. Many of the members live and/or own property along the corridor where SSA impacts now constitute a public nuisance in the form of noise, traffic, pollution, breaches of the right to peace and quiet, and threats to public health and safety.

For the past five years, SMART Citizens Task Force has advocated for the opening of an off-Cape freight port to the islands in order to transport time-non-sensitive provisions, supplies, and fuel to the islands via water from the mainland rather than by road. We have petitioned the SSA for this change five times under Section 15A of the SSA Enabling Act from 2017 to 2021. These petitions have included several hundred letters from residents that object to the SSA sending freight through our residential neighborhoods. SMART Citizens Task Force maintains an electronic mailing list of 800 recipients and regularly distributes regional transportation information. The SMART website is www.smartcitizenstaskforce.org.

The Enabling Act of the Steamship Authority makes actions of the Steamship Authority's Board utterly unreviewable,¹ thus necessitating this action by the members of SMART Citizens Task Force.

¹ Murphy, Russell. "A Citizen's Guide to Understanding the Massachusetts Steamship Authority Enabling Act," Feb. 2021, <https://smartmassachusetts.files.wordpress.com/2017/11/ssa-enabling-act-citizens-guide.pdf>

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Background

In 2000, Governor Cellucci appointed the highly respected jurist Rudolph Kass to lead the Governor's New Bedford, Cape and Islands Ferry Service Task Force. Executive Order No. 425 creating the Task Force noted that "the need to develop effective options to address Cape Cod's traffic concerns is critical; . . . ferry service to the Islands must be evaluated in light of the region's entire transportation system and the desire to further economic growth and recreational traditions while protecting and securing the natural resources and beauty of the Commonwealth's islands and beaches; ... (T)he communities most affected by any expansion of ferry service to the Islands - the Cape, the Islands and New Bedford - must be afforded the opportunity to participate in a fair and objective process regarding the benefits and costs of such expansion."²

The Kass Report, issued in April 2001, noted that "The residents of Hyannis and Wood's [sic] Hole and their community leaders are concerned to the point of anger that they are choked by more automobile traffic than they can handle, and that ferry bound traffic greatly aggravates these problems. Those communities agitate for the relief of pressure on their roads by directing some Islands-bound vehicles to an off-Cape port. New Bedford is well situated to perform this function."³

² Executive Order No. 425: Establishing the Governor's New Bedford, Cape and Islands Ferry Service Task Force, <https://www.mass.gov/executive-orders/no-425-establishing-the-governors-new-bedford-cape-and-islands-ferry-service-task-force>

³ Kass Report, <https://smartmassachusetts.files.wordpress.com/2017/11/2001-task-force-report.pdf>

In the 20 years since the Kass Report, the only changes that have occurred have been negative. The impacts of continued dramatic increases in truck and auto traffic have risen to the level of being a public nuisance – more trucks, more cars, more passengers, more pollution, more ferry trips, bigger ferries, the addition of predawn freight boats, and no progress toward an off-Cape port.

Judge Kass noted that “surges of car and truck traffic that bring movement to a standstill, produce noise, and foul the humid summer atmosphere with exhaust fumes” are especially impactful on Woods Hole. Judge Kass added that, “The SSA recognizes this (in relation to Hyannis) and has entered into an agreement with Barnstable to reduce freight from the Hyannis terminal to Nantucket to the levels of 1997.”⁴ While this agreement remains in force, no such agreement exists with Falmouth for the port of Woods Hole, a port with far more ferry operations than Hyannis. More than 20 years ago Judge Kass concluded: “We recommend, therefore, that the SSA plan for off-Cape service from New Bedford to the Islands. This will be an alternate service.”⁵

Since the Kass Report was issued the only modification in operations by the SSA has been a seasonal licensed passenger only ferry from New Bedford to Martha’s Vineyard which replaced the long-time grandfathered operation of the M.V.

⁴ Memorandum of Understanding between the Woods Hole Martha's Vineyard and Nantucket Steamship Authority and the Town of Barnstable (as amended), <https://smartmassachusetts.files.wordpress.com/2017/11/ssa-1.pdf>

⁵ Kass Report, pg. 3-4. The Report continues: “The fears of the islanders that they will be deprived of access to shopping and medical care on the Cape are misplaced. We do not suggest, and the SSA has no plans for, the termination or even severe curtailment of service to Nantucket from Hyannis and to Martha's Vineyard from Woods Hole.”

Schamonchi.⁶ Thus, nothing has changed relative to New Bedford except the addition of a more modern high-speed vessel that provides limited and seasonal passenger-only service.⁷

Defining a public nuisance

"‘A public nuisance is an unreasonable interference with a right common to the general public.’ In determining whether there has been an unreasonable interference with a public right, a court may consider, inter alia, ‘[w]hether the conduct involves a significant interference with the public health, the public safety, the public peace, the public comfort or the public convenience’" Sullivan v. Chief Justice for Administration and Finance of the Trial Court, 448 Mass. 15, 34 (2006) quoting Restatement (Second) of Torts s. 821B (1979).

The evidence outlined in this letter establishes the existence of a substantial, unreasonable, and unnecessary interference with public rights. Judge Kass predicted the likelihood of a public nuisance on the part of the SSA 20 years ago if changes were not implemented. His prediction and concerns have come to fruition. The SSA has tragically exacerbated the harms to the public foreseen by Judge Kass – extraordinarily large traffic increases that jeopardize the health and public safety of residents of Falmouth. This is particularly so for those who live along the

⁶ The Schamonchi is the ferry that Judge Kass refers to on page 4 of the Kass Report. "Since the Task Force was convened, the SSA has announced it would run passenger service from New Bedford to Martha's Vineyard. It has acquired a vessel for that purpose."

⁷ SeaStreak has been licensed to provide fast-ferry passenger service. No freight is carried by SeaStreak.

6-mile-long Woods Hole corridor – the corridor used by ferry patrons through Falmouth to the village of Woods Hole.⁸

As the Supreme Judicial Court instructs, “Not just any plaintiff can bring a public nuisance action. ‘An information in equity by the Attorney General is the normal remedy for the abatement of a public nuisance.’” Id. quoting Mayor of Cambridge v. Dean, 300 Mass. 174, 175 (1938). Thus, the members of SMART Citizens Task Force call on you, the Attorney General, to take swift and appropriate action to eliminate the public nuisance caused by the SSA.

Summary of past evidence of a public nuisance

In 1994 the SSA was placed on notice that Falmouth had only a decade or two before it could no longer handle the growth of SSA traffic. (The SSA has accepted the validity of the 1994 Urban Harbors Institute Report entitled *The Impact of a Ferry System Upon its Communities*⁹ by relying on it in SSA court filings.¹⁰) The 1994 report concluded that Falmouth “could face in one or two decades seriously deficient conditions on its major roadways which could jeopardize the efficient and timely operations of the ferry system.” Accordingly, the Urban Harbors

⁸ The Woods Hole corridor (West Falmouth Highway, Palmer Ave., North Main St., Locust St., Woods Hole Road, Crane St., Cowdry Road) is a 2-lane roadway with twists and turns. For the most part the entire corridor is residential in nature. There is a 135 degree turn at Watson’s Corner that forces trucks and buses to cross regularly into opposing traffic to navigate the turn.

⁹ Urban Harbors Institute, “The Impact of a Ferry System upon its Communities,” 1994, <https://smartmassachusetts.files.wordpress.com/2017/11/full-version-of-uhi-report-1994.pdf>

¹⁰ “Local Rule 56.1 Statement of the Woods Hole, Martha’s Vineyard and Nantucket Steamship Authority,” May 31, 2002, <https://smartmassachusetts.files.wordpress.com/2017/11/ssas-local-rule-56.1-statement.pdf>

Institute report stated, “the continued use of Woods Hole Terminal as the sole Steamship Authority egress to Martha’s Vineyard may not be possible.”¹¹

The Urban Harbors Institute based its doomsday timeline for Woods Hole on a SSA traffic growth rate of between 3 and 4 percent per year.¹² Since the Kass Report, trucks and large transport vehicles have grown not only more numerous, but are significantly larger and heavier.

Truck growth Woods Hole - Martha’s Vineyard

Table 1 demonstrates the trend in truck volume growth between Woods Hole and Martha’s Vineyard, representing a doubling of truck numbers between 2001 and 2019.

¹¹ Ibid., page 27-28.

¹² Ibid., page 27.

WOODS HOLE, MARTHA'S VINEYARD AND NANTUCKET STEAMSHIP AUTHORITY

TRUCKS CARRIED/ MARTHA'S VINEYARD AND NANTUCKET

	<u>JAN</u>	<u>FEB</u>	<u>MAR</u>	<u>APR</u>	<u>MAY</u>	<u>JUN</u>	<u>JUL</u>	<u>AUG</u>	<u>SEP</u>	<u>OCT</u>	<u>NOV</u>	<u>DEC</u>	<u>TOTAL</u>
MAINLAND TO THE VINEYARD AND RETURN													
1996	3,687	4,144	4,954	5,762	6,551	5,924	5,609	5,578	5,109	5,563	4,817	4,529	62,227
1997	4,175	3,952	5,005	6,153	6,961	6,350	6,244	5,528	5,472	5,791	4,742	4,799	65,172
1998	4,608	4,382	5,719	6,645	6,600	6,329	6,540	5,871	5,849	5,975	4,878	4,760	68,156
1999	4,604	4,394	5,823	6,838	7,080	7,157	6,396	6,358	5,981	6,029	5,561	5,440	71,661
2000	4,900	4,984	6,209	6,489	7,607	7,391	6,388	6,823	5,829	6,071	5,158	4,693	72,542
2001	5,064	5,053	5,627	6,773	7,585	7,347	6,956	6,868	5,819	6,063	5,447	4,669	73,271
2002	4,976	4,563	5,667	6,999	7,343	7,149	7,181	6,809	6,123	6,118	5,087	4,436	72,451
2003	4,759	4,014	5,406	6,517	7,179	7,333	7,182	6,569	6,107	6,183	4,684	4,613	70,546
2004	5,881	5,747	7,021	7,790	8,557	9,001	8,050	7,660	7,149	7,353	6,468	6,489	87,166
2005	5,991	6,385	7,788	8,842	9,678	9,543	8,630	8,655	8,442	8,052	7,733	7,856	97,595
2006	7,522	7,070	9,199	9,736	10,513	10,094	9,003	8,802	8,511	8,452	7,785	7,252	103,939
2007	6,864	6,378	8,041	8,683	10,292	9,574	8,655	8,710	7,803	8,555	7,810	6,892	98,257
2008	7,047	6,822	8,226	9,277	9,645	9,430	8,976	8,085	8,248	8,378	7,155	7,104	98,393
2009	7,480	7,277	8,807	10,392	11,222	11,548	11,106	10,092	10,389	10,019	8,607	8,661	115,600
2010	7,591	7,183	9,602	10,510	11,516	11,759	10,632	9,965	10,178	9,733	8,832	8,960	116,461
2011	7,439	7,227	9,439	9,967	11,272	11,679	10,631	10,256	9,893	9,798	8,747	8,434	114,782
2012	7,322	7,460	9,150	9,887	11,505	11,106	10,480	10,271	9,457	9,143	8,854	8,323	112,958
2013	7,739	6,857	9,020	10,562	12,281	11,669	11,461	10,491	10,604	10,779	8,891	8,568	118,922
2014	7,620	7,588	9,115	11,011	12,170	12,084	11,419	10,091	11,144	11,067	8,936	9,135	121,380
2015	7,290	6,862	9,594	11,326	12,590	12,516	11,841	10,511	11,483	11,480	9,956	9,629	125,078
2016	8,441	8,107	10,921	11,795	12,988	13,157	11,773	11,202	11,582	11,343	10,482	9,794	131,585
2017	8,806	8,267	10,611	12,283	14,177	13,807	12,133	11,970	11,049	12,634	11,031	9,938	136,706
2018	8,783	8,845	8,811	11,925	14,037	13,801	12,718	12,453	12,183	12,522	11,065	10,492	137,635
2019	9,352	9,029	11,607	12,801	14,134	13,680	13,066	12,474	12,308	11,825	10,788	10,228	141,292
2020	9,588	9,496	8,873	5,483	9,111	12,771	12,680	11,976	11,860	12,824	10,742	10,807	126,211
2021	9,987	9,114	12,134	13,420	13,474	13,074	12,847	12,473	12,867	12,251	11,788		133,429

In 2004, changes to the SSA's rate structure for vehicles less than 20 feet in length resulted in a reclassification of certain vehicles from Automobiles to Trucks

In 2009, the SSA no longer classified any non-commercial trucks of any length as automobiles.

Note: Traffic Statistics represent one-way totals. A round trip passage is counted as two.

Table 1. Table created and published by the Steamship Authority.¹³

¹³ See https://www-steamship-assets.s3.amazonaws.com/versioned_downloadable_forms/path/november_2021_monthly_traffic_statistics.pdf

Trucks carried to and from Martha's Vineyard, 1991-2016, and projection scenarios

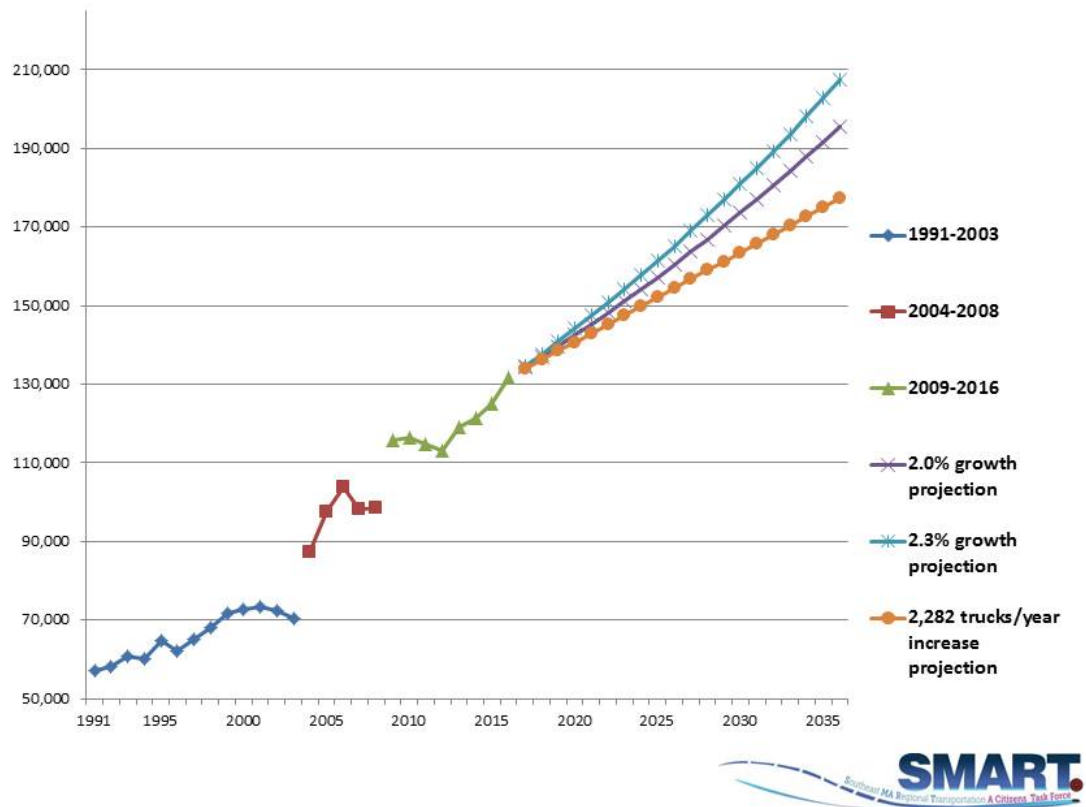


Figure 1. Projections calculated by SMART Citizens Task Force.¹⁴

Truck traffic between Woods Hole and Martha's Vineyard shows no sign of slowing (Figure 1). Trucks and freight ferries are the biggest contributors to the existence of the public nuisance presented in this letter - noise pollution, serious threats to public safety, and harmful emissions in close vicinity to residential homes.

¹⁴ See <https://smartmassachusetts.files.wordpress.com/2017/11/21jan2018projections.pptx>

Martha's Vineyard has two SSA ports, Vineyard Haven and Oak Bluffs. Woods Hole is the only mainland SSA port that serves the Vineyard. Use of the Woods Hole port is now so overstressed as to constitute an intrusion on public rights. An off-Cape port is widely recognized as the only way to mitigate or eliminate the existing public nuisance in Falmouth.

Identification of specific public nuisances

1. Noise pollution and sleep disruption for approx. 1,000 households in Falmouth

Freight trucks that are scheduled on the 5:30AM scheduled freight boat from Woods Hole, first introduced in 2012 and operating now during seven months of the year, are noisy and disruptive. The six-mile Woods Hole corridor is almost entirely residential. Only a small section is light commercial. Freight trucks traveling to Woods Hole terminal wake hundreds of Falmouth residents on a daily basis during the predawn hours during seven months of the year. There was no 5:30AM freight ferry from Woods Hole when the Kass Report was written.

This early morning noise pollution has been the source of five public hearings over the past five years as a result of citizen petition and use of the Section 15A clause of the Steamship Authority's Enabling Act. Noise is a public health concern that falls within the scope of Massachusetts Department of

Environmental Protection (MassDEP) authority as a form of regulated air pollution.¹⁵

The Section 15A clause of the Steamship Authority's Enabling Act permits the public to request a public hearing concerning the schedules of the SSA.¹⁶ The SSA, while acknowledging a problem, has refused to take any significant action to reduce overall freight traffic through Woods Hole village or eliminate the 5:30AM trip. The following SSA-authored reports were issued as a result of these public hearings (the Enabling Act requires the SSA to issue these reports after a petition for a public hearing from more than 50 residents):

[Summer 2022 Schedules](#)¹⁷ (as an example of those impacted, 120 attendees took part in the May 2021 hearing for this report)

[Summer and Fall 2021 Schedules](#)¹⁸

[Summer 2020 Schedules](#)¹⁹

[Summer 2018 Schedules](#)²⁰

[Winter and Spring 2018 Schedules](#)²¹

The Section 15A report for [Summer 2018 Schedules](#) committed the SSA to allow trucks only under 40 feet on the SSA's

¹⁵ M.G.L. Chapter 111, Sections 142A-M, 310 CMR 7.00: Air Pollution Control, and MassDEP Noise Policy, <https://www.mass.gov/files/documents/2018/01/31/noise-interpretation.pdf>

¹⁶ Steamship Authority's Enabling Act, <https://www.nantucket-ma.gov/DocumentCenter/View/1115/SSA-Enabling-Act?bidId=>

¹⁷ See https://www-steamship-assets.s3.amazonaws.com/versioned_downloadable_forms/path/15a_report_-_proposed_2022_summer_operating_schedules_-_approved_09.pdf

¹⁸ See https://www-steamship-assets.s3.amazonaws.com/versioned_downloadable_forms/path/report_-_proposed_2021_summer_operating_schedules_with_appendices_-_2020-08-18_approved_part1_copy1.pdf

¹⁹ See https://www-steamship-assets.s3.amazonaws.com/versioned_downloadable_forms/path/report_-_proposed_2020_summer_operating_schedules_-_final_copy1.pdf

²⁰ See https://www-steamship-assets.s3.amazonaws.com/versioned_downloadable_forms/path/summer_report_-_1.pdf

²¹ See https://www-steamship-assets.s3.amazonaws.com/versioned_downloadable_forms/path/report_and_proposed_schedules_copy1.pdf

5:30AM freight ferry from Woods Hole. This condition moved longer than 40-foot trucks to ferries later in the day, but resulted in additional less-than-40-foot trucks on the 5:30AM ferry. The SSA's intended mitigation of noise pollution associated with the 5:30AM ferry simply increased the total number of trucks on the 5:30 AM ferry (shorter trucks, but more trucks). The SSA also committed to allowing trucks on its Woods Hole property only at 5:10AM. This measure has not significantly reduced noise in Falmouth neighborhoods, and beginning well before 5:00AM, trucks simply queue in neighborhood areas 1-5 miles away from the WH terminal.

The Falmouth Select Board has on three separate occasions over the last five years formally requested that the SSA's first freight departure from Woods Hole be scheduled no earlier than 6:30AM. Falmouth Select Board Chair Susan L. Moran²² wrote in a letter to the SSA dated June 19, 2017: "[I]t is the Board's position that a 5:30 AM freight departure from Woods Hole presents an unreasonable burden to our community. We implore you to give serious consideration to changing the first freight departure to 6:30 AM for calendar year 2018 and thereafter."²³ All three written requests from the Falmouth Select Board have been ignored. The Falmouth Select Board has received no written response to any of its three letters to the SSA regarding the 5:30AM boat.

At a meeting of the Falmouth Transportation Committee in 2021, SSA General Manager Robert Davis was unable to define either "adequate" or "necessaries" when asked how the SSA

²² Now Senator Susan Moran, Plymouth/Barnstable District.

²³ See <https://woodsholesite.wordpress.com/page/2/>

interprets those terms in the Enabling Act.²⁴ Many of the trucks traveling on early morning vessels are not carrying “necessaries,” nor time-sensitive goods.²⁵

2. Public safety

The presence of serious and unreasonable threats to public safety is an important element of public nuisance. Trucks driving down the wrong side of streets in Woods Hole, large trucks crossing over the centerline into oncoming traffic at Watson’s Corner in Falmouth, trucks in traffic hindering access to Falmouth Hospital, and heavy trucks unable to stop for school buses boarding or disembarking students are documented common occurrences.²⁶

The sheer volume of SSA-related truck traffic and the speeds at which they travel on residential roads in Falmouth present an obvious public safety issue. Local police lack the resources to fully control these problems. All of these threats and violations are directly traceable to SSA operations.

A special and continuing safety hazard exists at Falmouth’s Watson’s Corner (intersection of West Main, North Main and

²⁴ Section 1 of the Enabling Act, <https://www.nantucket-ma.gov/DocumentCenter/View/1115/SSA-Enabling-Act?bidId=>. See meeting of Falmouth Transportation Committee, April 22, 2021, at <https://www.youtube.com/watch?v=dM9LhqdQXBc>

²⁵ SMART Citizens Task Force’s repeated observation is that the 5:30AM freight ferry carries regular deliveries of landscaping materials and consumer electronics. For video evidence from the first eight days in May 2020 of the inventories of the 5:30AM freight trip, see <https://woodsholesite.wordpress.com/2020/07/20/results-of-8-day-monitoring-of-truck-inventory-on-530am-freight-ferry-wh-to-vh-june-17-to-june-24-2020/>

²⁶ See <https://youtu.be/ILGIoosmVp0> for example of a stopped school bus passing incident.

Locust Street). It cannot be negotiated by even average-size trucks without crossing into oncoming traffic because of its geometry (here the road lane in each direction is narrow and the intersection requires a 135-degree turn). At this intersection, and all along Woods Hole Road, there is a feeling of the inevitability of a serious or deadly accident from freight trucks if things are not changed.

In 2021 there have been at least three documented stopped school bus violations by Vineyard-bound trucks.²⁷ These violations have been attributed to a combination of factors including size, weight, grade, sight lines, and excessive speed.

Falmouth residents have written several hundred letters to the Steamship Authority in the last five years about the negative impacts of trucks on Falmouth and Woods Hole residential neighborhoods. Those letters can be viewed at the www.woodshole.net website.²⁸ The www.woodshole.net website contains video evidence of the impacts of the SSA-related trucks.²⁹

These letters and visual evidence attest to the widespread and persistent nature of the public nuisance of SSA-related freight trucks in Falmouth.

²⁷ Ibid.

²⁸ See <https://woodsholesite.wordpress.com/2020/07/07/public-comments-received-by-ssa-related-to-june-11-2020-public-hearing-comments-obtained-by-public-records-act-request-on-july-7-2020/>

²⁹ See <https://youtu.be/5TY8x3iL3aQ>

3. Hospital access is regularly blocked during peak times

Falmouth Hospital access along the Woods Hole corridor is regularly hindered during peak traffic hours by ferry truck and automobile traffic. The hospital operates one of the only two emergency rooms on all of Cape Cod.

Backups (frequently from one half to three quarters of a mile in length) at the hospital lights intersection, which controls access to the emergency room, are commonplace.³⁰

The narrow roadway of Palmer Avenue makes it difficult for ambulances to pass vehicles stopped in traffic. There is no breakdown lane on Palmer Avenue for stopped traffic to use in the need of ambulance passage.

4. Queuing by the SSA's traffic leads to regular backups on public roads in an already congested village

Traffic backups consisting of both automobiles and trucks have become increasingly common in the vicinity of the SSA terminal in Woods Hole.

Automobiles and trucks back up from the Woods Hole ferry terminal onto Crane Street and the state-owned Woods Hole Road and bring access and commerce to the village to a stop.

³⁰ The intersection of Route 28, Jones Road, and Ter Heun Drive is known locally as the hospital lights.

Public safety vehicles are also unable to pass when those backups occur.³¹

5. Diesel emissions from trucks in residential neighborhoods

Diesel soot and other emissions from the high volume of trucks passing in very close proximity to residential homes have a negative impact on residents' health. Residents' homes are located as close as 20 feet to passing freight trucks along Crane St., Woods Hole Road, Locust St., North Main St., and Palmer Ave.

Children, particularly vulnerable to air pollution impacts, are subject to the fumes and emissions from those trucks, as the children await school bus pickups along the Woods Hole Road corridor. There are five public school bus stops alone in the mile before Woods Hole Terminal on Woods Hole Road. PM_{2.5} and smaller particulate matter have been shown to have long-term negative health impacts.³²

Video evidence of the soot as it is being emitted from trucks has been collected for Woods Hole Road.³³

³¹ See <https://www.youtube.com/watch?v=7YWePS7ZH5E> (6:30PM-8:30PM, Sunday, Nov. 7, 2021 1 of 3); https://www.youtube.com/watch?v=nh_9Aji3xqA (2 of 3); <https://www.youtube.com/watch?v=dIL7dtL9X4M> (3 of 3).

³² Particulate matter 2.5 (PM_{2.5}) refers to particles in the air that are two and one-half microns or less in width.

³³ For example, see <https://youtu.be/rjEhGsuh7L4> and 1 min. 35 sec. and also 5 min. 35 sec. timestamps.

The total number of trucks carried by the Steamship Authority between Woods Hole and Martha's Vineyard can exceed 600 trucks per day on summer weekdays.³⁴

6. The SSA has been slow to embrace low emission ferries and shuttle buses

While many transportation systems, including other ferry systems,³⁵ have begun to embrace low emission vessels and shuttle buses,³⁶ the SSA has not committed to low emission operations.

Despite incremental improvements in diesel emission standards, emissions have increased substantially in Falmouth since the Kass Report in 2001 due to more freight vessel trips scheduled from and to Woods Hole.

In 2018, the SSA added six new one-way freight trips to its Woods Hole – Vineyard route, an increase of approximately 12 percent of total freight trips in a single year.

There is no idle-time restriction on the SSA diesel-powered vessels.

³⁴ <https://smartmassachusetts.files.wordpress.com/2021/11/smart-approach-to-how-it-arrives-at-the-truck-count-on-the-woods-hole-vineyard-route.pdf>

³⁵ Washington State Ferries System Electrification Plan, December 2020, see https://app.leg.wa.gov/ReportsToTheLegislature/Home/GetPDF?fileName=01_WSF-System-Electrification-Plan-December2020_cd3399a2-3f5f-4362-b09a-b0c0f4ea34d0.pdf

³⁶ Sixteen of the Vineyard Transit Authority's buses are electric buses. The SSA operates a larger total number of shuttle buses than the VTA, but has not yet deployed a single electric bus.

Continuing and future alarming trends

Noise, public safety, and other disturbances, visible and readily observable throughout the day in Woods Hole village and corridor to Falmouth, have increased in total volume as the total number of freight trips has increased.

Woods Hole Road is not designed for, nor can it safely accommodate its current level of freight trucks. Massachusetts Department of Transportation (MassDOT) has recognized the need to reduce truck traffic within the Bourne-Falmouth-Woods Hole corridor by recently tasking the Urban Harbors Institute to identify the possible benefits of diverting Vineyard freight to off-Cape ports.”³⁷

Growth continues on Martha’s Vineyard. The 2020 census (conducted in 2021) showed a 24% growth increase on the Vineyard over the last decade.³⁸ This can only put greater and unsustainable pressure on Woods Hole’s port.

Judge Kass noted the need for the Vineyard to address traffic and growth on the island, “We think, in the final analysis, that reduction of ... traffic on, and therefore to the Islands can only be the product of planning decisions on the Islands.”³⁹ As long

³⁷ See agreement of May 11, 2020 between MassDOT and the University of Massachusetts-Boston to undertake the "Exploring Short-Sea Shipping as an Alternative to Non-Bulk Freight Trucking in Southeastern, MA" project, <https://smartmassachusetts.files.wordpress.com/2017/11/award-isa-111256-short-sea-shipping-sow.pdf>; the agreement characterized the off-Cape ports as “relevant southeastern Massachusetts harbors.” See Urban Harbors Institute, “Exploring Short-Sea Shipping as an Alternative to Non-Bulk Freight Trucking in Southeastern MA,” 2021, <https://smartmassachusetts.files.wordpress.com/2017/11/uhi-massdot-research-project-final-report-using-federal-hwy-admin-data-1.pdf>

³⁸ <https://vineyardgazette.com/news/2021/08/19/census-shows-vineyard-population-has-grown-diversified>

³⁹ Kass Report, p.3.

as the SSA is willing to transport whatever volume of freight that demand incurs, there is little basis for regional traffic mitigation planning to occur in Falmouth and on the Vineyard.

Summary of grievances

The growth of SSA-related truck traffic on West Falmouth Highway, Palmer Avenue, North Main Street, Locust Street, Woods Hole Road, Crane Street, and Cowdry Road is untenable for the approximately 1,000 households that live on that route. Town Manager Julian Suso wrote in a letter on behalf of the Select Board to MassDOT about this state-owned route as recently as in April 2021: “The number of trucks carrying significant loads and expanding vehicle speeds are extremely concerning, all contributing to challenging public safety issues.”⁴⁰

The Falmouth Transportation Committee has studied the SSA schedule and determined that multiple alternatives exist: 1) establishing the long promised off-Cape port; 2) improving inefficiencies in the system; 3) connecting the interstate highway system directly to the maritime highway e.g. New Bedford; 4) increasing reliance on bulk/barge transport; 5) better utilization of the existing “optional” early afternoon freight boat; 6) simply delaying the entire schedule by 30 minutes.⁴¹

⁴⁰ <https://www.capecodtimes.com/story/news/2021/04/08/woods-hole-road-speeding-jake-brakes-problems-cape-cod-ma/7101517002/>

⁴¹ See Falmouth Transportation Committee report of May 13, 2021 at <https://smartmassachusetts.files.wordpress.com/2017/11/tmc-freight-voted-2.pdf> and report of September 10, 2020

Other considerations

In 2012 the SSA canceled an underutilized evening freight trip and replaced that trip with a new first trip of the day at 5:30AM. The SSA in this way eliminated a previously existing freight trip that was causing minimal impact and not interrupting sleep. This decision was made exclusively for the convenience of a small number of truck companies and arguably truck companies not transporting necessities. The decision was not based upon adequacy of service. The 5:30AM trip often carries non-necessaries and multiple trucks from the same companies (believed to carry only partial loads).⁴²

The Massachusetts Legislature has also identified the need to mitigate the impacts of ferry operation impacts on port communities. Section 11 of Chapter 55 of the Acts of 2003 created the so-called Ferry Embarkation Fee.⁴³ The fee is collected by ferry boat operators who embark passengers in the various ports provided the ferry boat is licensed to carry more than 100 passengers. According to the Act, Ferry Embarkation Fees must be deposited in a “special fund” and “solely appropriated for the purpose of mitigating the impacts of ferry service.” At the same time, SMART Citizens Task Force

at <https://smartmassachusetts.files.wordpress.com/2017/11/tmc-ssa-preliminary-report-with-letter.pdf> and report of May 13, 2021 at <https://smartmassachusetts.files.wordpress.com/2017/11/tmc-freight-voted-2.pdf>

⁴² The Falmouth Transportation Committee has identified a number of inefficiencies in the freight operations including that approximately 40 percent of trucks are not transporting necessities. The SSA does not monitor the weight of the freight it carries; the SSA monitors only the length of freight trucks. See Falmouth Transportation Committee reports of September 10, 2020 at <https://smartmassachusetts.files.wordpress.com/2017/11/tmc-ssa-preliminary-report-with-letter.pdf> and of May 13, 2021 at <https://smartmassachusetts.files.wordpress.com/2017/11/tmc-freight-voted-2.pdf>.

⁴³ <https://malegislature.gov/Laws/SessionLaws/Acts/2003/Chapter55>

concludes it is not possible to mitigate an overburdened easement.

A recent *Boston Globe* article also has emphasized this SSA-related freight growth problem in Falmouth and Woods Hole.⁴⁴

SSA’s first justification for inaction: Enabling legislation is too often cited as a basis for demand-based system

Nothing in the SSA Enabling Act permits the Steamship Authority to create a nuisance, public or private. The statutory charge/authorization is limited. The Act instructs the SSA to provide “adequate” ferry service of “persons and necessities.”⁴⁵

The SSA has interpreted this charge as providing a demand-based system that extends well beyond adequate. An example is the establishment of the 5:30AM freight boat from Woods Hole. Nowhere in the Act does it permit the SSA to awaken entire neighborhoods every morning before 5:30AM.

The Massachusetts Legislature first applied “adequate” to the ferry service level in 1948. Chapter 544 of the Acts of 1948 directed the Authority “to provide adequate transportation of persons and necessities of life for the islands of Nantucket and

⁴⁴ “Complaints about ferry service to Martha’s Vineyard and Nantucket coming to a head amid surging tourism,” *Boston Globe*, August 28, 2021. <https://www.bostonglobe.com/2021/08/28/metro/complaints-about-ferry-service-marthas-vineyard-nantucket-coming-head-amid-surg-ing-tourism/>

⁴⁵ Enabling Act of the Steamship Authority, <https://www.nantucket-ma.gov/DocumentCenter/View/1115/SSA-Enabling-Act?bidId=>

Martha's Vineyard.” There is identical language in the current Enabling Act.⁴⁶

The Legislature provided insight into the intended meaning of adequate by enacting Chapter 747 of the Acts of 1956. “The Authority shall provide adequate transportation of persons and necessities of life for the islands of Nantucket and Martha's Vineyard throughout the year, and shall provide regularly scheduled ferry runs daily throughout the year of the type that will accommodate standard size trucks and semi tractor-trailer vehicles to and from the ports of New Bedford, Woods Hole, Vineyard Haven and Nantucket and adequate ferry slips or transfer bridges shall be constructed and maintained at said ports to facilitate and accommodate said vehicular traffic.”⁴⁷

The takeaway from the 1956 legislative action is that “adequate” is focused on the “necessaries of life” and not on the convenience of moving an on-demand system. At the time of the Kass Report, the SSA appeared to acknowledge this and articulated a need to reduce vehicle levels. “As to Martha's Vineyard, the SSA has set a goal of bringing automobile traffic back to the volume of 1995.”⁴⁸ But traffic continues to increase since the Kass Report and 1995 levels have not been reestablished.

In Woods Hole, Martha's Vineyard and Nantucket Steamship Authority v. Martha's Vineyard Comm'n., 380 Mass. 785, n.16,

⁴⁶ <https://www.casemine.com/judgement/us/5914c9f3add7b049347f682a>

⁴⁷ <https://archives.lib.state.ma.us/bitstream/handle/2452/46055/1956acts0747.txt?sequence=1&isAllowed=y>

⁴⁸ Kass Report.

(1980), the Supreme Judicial Court pointed out that the section of law noted above was not carried forward into the 1960 Act. In 1956, the Legislature amended the Authority's predecessor statute, St. 1948, c. 544, to add a new Section 5A. St. 1956, c. 747. This new section provided, among other things, that “[t]he Authority shall provide adequate transportation of persons and necessities of life for the islands of Nantucket and Martha's Vineyard throughout the year ... and adequate ferry slips or transfer bridges shall be constructed and maintained at [named ports, including Vineyard Haven] to facilitate and accommodate said vehicular traffic.”⁴⁹

SSA’s second justification for inaction: immunity and/or exemption

The Enabling Act does not provide the SSA with immunity from suit for establishing a public nuisance. The SSA has routinely used its zoning exemption/immunity to expand its operations.⁵⁰ Since Village of Euclid v. Ambler Realty Co., 272 U.S. 365, 392-93 (1927), zoning has been recognized as a tool to prevent and abate nuisances.”⁵¹ However, because an entity is exempt from zoning does not mean it is exempt from actions in nuisance.

⁴⁹ When the predecessor statute was replaced by St. 1960, c. 701, no similar language was included. The present act does authorize the Authority to “construct, maintain and operate necessary vessels, docks, wharves” St. 1960, c. 701, Section 1. The footnote is used by the Court to refute an SSA claim that it was free from the Martha’s Vineyard Commission regulation in the construction of ferry slips.

⁵⁰ See, e.g. Town of Bourne v. Plante, 429 Mass. 329 (1999), concerning expansion of parking into Bourne.

⁵¹ “A nuisance may be merely the right thing in the wrong place, like a pig in the parlor instead of the barnyard.” See page 388.

Public entities are fully accountable for public nuisance. The Supreme Court in Missouri v. Illinois, 200 U.S. 496 (1906) recognized public nuisance as a valid equitable claim against governmental entities when supported by the evidence. Governmental entities have been held liable for nuisance in Massachusetts.⁵² It is settled law that the SSA is not immune from public nuisance actions brought by the Attorney General.

SSA's third justification for inaction: economics

The SSA has always cited the economics of an alternative port for its failure to address the nuisance it has created in Falmouth. Even Judge Kass acknowledged this more than twenty years ago.⁵³

History teaches that matters of public nuisance that threaten public health and safety cannot be determined or resolved purely on the basis of cost. Love Canal, Woburn, Housatonic River, the Massachusetts Military Reservation and New Bedford Harbor would all have remained polluted if that was the approach. Economics has been rejected as a defense for public nuisance.⁵⁴

Economics might be a consideration in forming an appropriate remedy, but economic justifications do not suffice to ignore a

⁵² See *Attorney General v. City of Woburn*, 322 Mass. 634 (1948), *Murphy v. Town of Chatham*, 41 Mass. App. Ct. 821 (1996), *Tarzia v. Town of Hingham*, 35 Mass. App. 506 (1993), *Schleissner v. Provincetown*, 27 Mass. App. Ct. 392 (1989), *Asiala v. Fitchburg*, 27 Mass. App. Ct. 13 (1987).

⁵³ Kass Report, page 3.

⁵⁴ See e.g., D. Rendleman, *Rehabilitating the Nuisance Injunction to Protect the Environment*, 75 *Wash. & Lee L. Rev.* 1859 (2018), <https://scholarlycommons.law.wlu.edu/wlulr/vol75/iss4/4>

public nuisance.⁵⁵ When the SSA relies on cost arguments to justify the existing system, it uses a narrow and reductionist concept of cost, one that ignores proven public harms embodied in common rights to safety, health, and community well-being.

⁵⁵ No one can realistically argue that waking up entire neighborhoods every morning in the predawn hours, or blocking access to an emergency room, or routinely having 18-wheel trucks cross over the road centerline, or permitting trucks to pass stopped school buses do not constitute a public nuisance. No one can effectively argue that deliveries of electronics such as large screen televisions and landscaping materials such as mulch are “necessaries of life.”

Alternatives do exist within the discretion of the Authority

1. There are operationally viable off-Cape ports.
2. There are economically viable off-Cape ports.
3. Bulk freight is an operationally viable alternative to roll-on/roll-off trucks.
4. Bulk freight is arguably a far more economic means to move freight than roll-on/roll-off trucks.
5. The SSA can improve the efficiency of roll-on/roll-off operations.

Requested Relief

1. As concluded by Judge Kass, the Steamship Authority should pursue an off-Cape freight port as an alternate port to Woods Hole. Woods Hole will remain the Steamship Authority's primary mainland port.
2. Mandate that the SSA and Town of Falmouth create a permanent Memorandum of Understanding delineating service levels and mitigation requirements similar to the agreement between the SSA and Town of Barnstable.
3. Require the SSA to utilize only two (2) of the Woods Hole slips for ferry operations on any given day. The SSA assured residents that its 3rd slip is to be used only for a stand-by vessel for emergency operations.⁵⁶ That promise is now regularly violated.
4. Require the SSA to limit freight operating hours from 7AM to 10PM in Woods Hole.
5. Require the SSA to eliminate all standby vehicle service during its summer schedules.

⁵⁶ The SSA wrote in its Environmental Notification Form submitted to the Massachusetts Environmental Policy Act Office in advance of the current terminal reconstruction project in Woods Hole: "The use of the third slip is restricted to vessels with beams no greater than 62 feet and it is used by those vessels for waterborne transportation only in emergencies, such as when one of the other slips is inoperable or a vessel is disabled in one of the other slips, or if adverse weather conditions threaten the condition of ferry vessels or the safety of the public." See page 52 of <https://drive.google.com/file/d/1BsXnhnWoS7E8myLcmf-jFB-qWo8ZJfzf/view?usp=sharing>

6. Require the SSA to police and enforce environmental violations taking place on SSA property, e.g. idling, noise, exhaust/emissions, spillage.
7. Require the SSA to establish a zero-emission program with 50 percent emission reduction by 2030 and full implementation by 2040.
8. Require the SSA to eliminate all roll-on/roll-off trash hauling by 2026.

Conclusion

SMART brings this matter to the Office of the Attorney General as a last resort. Years of good faith efforts to advocate for change in the way the SSA manages its freight operations in Woods Hole have failed to result in any essential changes being made.

Our letter demonstrates that the SSA, in its acts and omissions, is causing a public nuisance and violating its obligations under the Enabling Act.

Section 6 of the Enabling Act for the SSA imposes a duty on the Steamship Authority to exercise its powers “for the benefit of the people of the commonwealth, for the increase of their commerce and prosperity, and for the improvement of their health and living conditions.”⁵⁷ The standard for creation of a public nuisance tracks this language, and its spirit, by condemning unreasonable and significant interferences with the public health, safety, and peace.

You, the Attorney General of the Commonwealth, are the person charged with protecting the public interest against the harms now caused by the SSA’s. With respect, we ask that you take all steps necessary to mitigate or eliminate this public nuisance.

SMART Citizens Task Force stands ready to support and assist you in mitigating or eliminating this ongoing public nuisance.

⁵⁷ <https://www.nantucket-ma.gov/DocumentCenter/View/1115/SSA-Enabling-Act?bidId=>

Thank you.

Individually and on behalf of the
Southeast Massachusetts Regional
Transportation (SMART) Citizens
Task Force



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cc: Governor Charlie Baker
Senator Susan Moran
Representative Dylan Fernandes
Representative David Vieira
Falmouth Select Board Chair Douglas Brown
Falmouth Select Board Vice Chair Nancy Taylor
Falmouth Transportation Committee Chair Edward DeWitt
General Manager of the Steamship Authority Robert Davis

Terence Kenneally

From: EDWARD DEWITT [REDACTED]
Sent: Wednesday, June 8, 2022 2:40 PM
To: schedules
Subject: Written Testimony
Attachments: 2001-task-force-report.pdf

Please see attached written testimony for the Section 15A public hearing scheduled on June 8, 2022.

Edward J. DeWitt
116 Pin Oak Way
Falmouth, MA 02540

~~CONFIDENTIAL~~
Gov
Task Force

APRIL 13, 2001

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April 13, 2001

The Governor's New Bedford, Cape and Islands Ferry Service Task Force submitted its report to the Governor today. We are pleased to provide you with a copy.

Rudolph Kass, Chair

Dan - Going public
as of 11 A.M.
But Gov will
have earlier
(R12)

REPORT OF THE GOVERNOR'S NEW BEDFORD, CAPE AND ISLANDS
FERRY SERVICE TASK FORCE

Your Excellency:

Executive Order No. 425, issued December 8, 2000, established the Governor's New Bedford, Cape and Island Ferry Service Task Force.¹ We have conducted public hearings on Nantucket, Martha's Vineyard, Cape Cod, and in New Bedford. In addition, we have studied the legislative history of the Woods Hole, Martha's Vineyard and Nantucket Steamship Authority (the "SSA"); conducted many interviews; have studied operational data of the SSA; considered studies, memoranda, and letters of opinion from interested citizens and groups in the areas of concern; have examined regional traffic studies; and, of course, have deliberated the salient issues among ourselves. We now make our report.

Two fundamental sets of observations came to guide the Task Force in this report.

First. Establishment of the SSA in 1948 by the Legislature was a response to the failure of private carriers to provide reliable year-round service to Martha's Vineyard and Nantucket. We understand that the SSA is the transportation lifeline for the island communities. There are other options: air transportation and licensed private carriers; but the vessels of last resort upon which the islanders rely after September and before June are those of the SSA. Under its enabling statute, St. 1960, c. 701, the SSA is "to provide adequate transportation and necessities of life for the islands of Nantucket and Martha's Vineyard."² The SSA is to fulfill that mission

¹The members of the task force are: Rudolph Kass, chair; Arthur L. Desrocher; Daniel A. Flynn; Kevin O'Neil; Rita Pacheco; Antone G. Souza, Jr.; Paul F. Walsh; and ex officio: Rick Armstrong (for the Director of the Office of Economic Development); Maeve Vallyly Bartlett (for the Secretary of the Executive Office of Environmental Affairs); Thomas S. Cahir (for the Secretary of the Executive Office of Transportation & Construction); and Peter Forman (for the Secretary of Administration & Finance).

²A public steamship authority was first established in 1948 by St. 1948, c. 544. Until the mid-1940's, the New York, New Haven & Hartford R.R. ran the island ferry service. When the railroad abandoned that service in the mid-1940's, a corporation formed for the purpose, Massachusetts Steamship Lines, undertook to provide it. In 1947, the principal vessel of that enterprise failed of Coast Guard certification. Massachusetts Steamship Lines lacked capital to sufficiently rebuild or replace the vessel, provoking the emergency that led to the formation of the SSA. As originally established, the SSA was The New Bedford, Woods Hole, Martha's Vineyard, and Nantucket Steamship Authority. In 1959, the recommendations of a second legislative commission produced a new SSA statute that dropped a New Bedford member of the SSA and renamed the SSA as the Woods Hole, Martha's Vineyard and Nantucket Steamship Authority. The reconstituted SSA dropped New Bedford as a port.

"without cost to the Commonwealth."

For the last 40 years, the SSA has provided reliable service to the island without running a deficit. Overall, the SSA has been responsibly run in the public interest. Its constituency recognizes that and supports the SSA; criticism from users - inevitable for any transportation system - most frequently concerns operational details. Tinkering with what has been a successful public authority needs, therefore, to be approached with reluctance and, certainly, with caution.

Second, The increased populations on the Cape and Islands, particularly in the summer season, present regional transportation problems with which the SSA, as a public authority, must deal. The residents of Hyannis and Wood's Hole and their community leaders are concerned to the point of anger that they are choked by more automobile traffic than they can handle, and that ferry bound traffic greatly aggravates those problems. Those communities agitate for the relief of pressure on their roads by directing some Islands-bound vehicles to an off-Cape port. New Bedford is well situated to perform that function.

1. Composition of the SSA. Although the executive order constituting the Task Force did not expressly ask it to consider the makeup of the SSA, the issue of representation is so powerful an element in the debate among the interested communities, that failing to deal with it in a report on ferry service to the Islands would be like staging Hamlet without Hamlet.

Under the 1960 legislation that reconfigured the SSA, the members of the Authority were drawn: one from Nantucket, one from Martha's Vineyard, and one from Falmouth. Were the SSA to run a deficit, Martha's Vineyard would have to pay for 50% of it, Nantucket 40%, and Falmouth 10%. From the time of the 1960 reconfiguration of the SSA, it has not run a deficit.

There has been a non-voting member from Barnstable since 1991. See St. 1991, c. 33, § 102. The non-voting status of the Barnstable member has poisoned the atmosphere in which the SSA and the people and public officials of Barnstable must co-exist. Issues that ought to be susceptible of rational and cooperative solution become instead occasions of rankling - for example, whether a street should be one-way, the location of parking areas, or the staging areas for trucks. Perhaps that ought not to be surprising in the state where "no taxation without representation" was a founding battle cry. People tolerate the decisions and inconveniences imposed by public authority better when they have a voice in them. For that reason, we recommend that the Barnstable member become a full voting member of the SSA. With the Barnstable member, thus, in parity with the Falmouth member, the Town Council of Barnstable should no longer have the power, conferred by St. 1993, c. 33, § 105, to disapprove acquisitions and capital improvements by the SSA in Barnstable.

As regional considerations press for pragmatic use of New Bedford as a supplementary off-Cape port, we recommend the addition of a voting New Bedford member to the SSA. Here again, a voice facilitates rational, business-like decision making - as opposed to high-decibel staking out of positions.

Although we think representation on the SSA from Barnstable and New Bedford will

promote the mission of the SSA, we recommend that voting control on the SSA be maintained by the Islands. It is the people of the Islands - particularly the year round residents - who need reliable ferry service provided as economically as possible. We have considered but rejected increasing the members to seven, so that the Islands would have four and the mainland ports would have three. As boards grow larger, however, they become more difficult to convene and generally less efficient. We recommend a board of five members, with the votes of the members weighted so that the Martha's Vineyard member's vote would weigh 30% of the whole, the Nantucket member's vote would weigh 25% of the whole, and each mainland member's vote would weigh 15% of the whole. On each vote, should the Island members vote together, they would constitute a controlling block of 55% of the whole; i.e., the Island members voting together would be a majority.

2. Share of a deficit. Participation in the governance of the SSA should carry with it responsibility for deficits should they occur. It is only reasonable that when the SSA members take steps that have economic consequences, that those consequences be shared by the participating regions. Responsibility for a deficit by the communities represented on the SSA has contributed to the avoidance of them. We recommend that the regions participate in deficits in the same proportion as their voting strengths, i.e.: Martha's Vineyard 30%, Nantucket 25%, Barnstable 15%, Falmouth 15%, and New Bedford 15%.

3. New Bedford as a relief port. Automobile traffic on Cape Cod during the summer season would be uncomfortably heavy even if there were no Island traffic at all. Nevertheless, traffic moves like a fluid and the final bit of load can plug the pipe. Particularly in Woods Hole and also in Hyannis there are surges of car and truck traffic that bring movement to a standstill, produce noise, and foul the humid summer atmosphere with exhaust fumes. The SSA recognizes this and has entered into an agreement with Barnstable to reduce the freight from the Hyannis terminal to Nantucket to the levels of 1997, with substantial progress toward that objective by 2003. As to Martha's Vineyard, the SSA has set a goal of bringing automobile traffic back to the volume of 1995; for Nantucket to the volume of 1996. We think, in the final analysis, that reduction of automobile traffic on, and, therefore, to the Islands can only be the product of planning decisions on the Islands.

Even if the SSA and the Executive Office of Transportation and Construction succeed in enticing some Island-bound travelers to off-Cape parking facilities or extending rail service to the Cape, we anticipate increasing demand for car reservations on ferries to the Islands. That has been the relentless pattern of the last three decades. The slope of the ascending graph may flatten, but it is unlikely to decrease.

Of the traffic to the Islands, between 45% and 50% of it comes from New York, Connecticut, central Massachusetts, and places other than north of the Cape. To the extent these travelers come by car, they drive near New Bedford. Sparing them the snail lines over the bridges to the Cape and on the roads to Hyannis and Woods Hole should be attractive.

We recommend, therefore, that the SSA plan for off-Cape service from New Bedford to the Islands. This will be alternate service. The fears of the islanders that they will be deprived of

access to shopping and medical care on the Cape are misplaced. We do not suggest, and the SSA has no plans for, the termination or even severe curtailment of service to Nantucket from Hyannis and to Martha's Vineyard from Woods Hole. Those runs are about one-fourth the mileage of runs through Quick's Hole from New Bedford.

Since the Task Force was convened, the SSA has announced it would run passenger service from New Bedford to Martha's Vineyard. It has acquired a vessel for that purpose. To make a New Bedford service effective, the city could greatly assist by working with the SSA to develop a passenger terminal and parking facilities in New Bedford. For the SSA, operating service to Martha's Vineyard and Nantucket from that port will involve acquisition of higher speed ferries with car carrying capacity. The SSA is engaged in preliminary financial analysis of the capital costs involved, the costs of operation (a fast ferry running to the Islands burns more fuel but can make many more runs in a day), and analysis of the demand. While New Bedford service for certain visitors to the Islands may be convenient and more pleasant, the SSA will have to keep rates roughly at parity with the rates from Woods Hole, even though the trip is longer. Were it otherwise, visitors may prefer to pay in inconvenience for the price of lower ferry costs at Woods Hole.

These are operational details, important to be sure, but details nonetheless. The Task Force does not purport to prescribe the timing or volume or fares of relief port service from New Bedford. Nor do we prescribe whether the supplementary service uses SSA vessels or vessels operated under SSA license. Finally, we do not prescribe that the SSA must carry freight from New Bedford. As a regional planning matter, that is desirable but the SSA is best equipped by experience and staffing to work out service that can pay its way. We repeat, the SSA has succeeded in providing safe and reliable service to the Islands without running a deficit and we do not wish to tamper with a machine that is not broken.

4. The freight pilot program. From May through October, 2000, the SSA has operated a pilot program of freight operation from New Bedford to Martha's Vineyard and return. The SSA invited proposals and let a contract for the service to Hvide Marine, Inc. For the first year of operation, the program was not a financial success. Occupancy never rose above 57% (during August). The SSA ran a loss of \$1,291,000 in operating the service. Those costs were borne, in the form of a surcharge, by users of the Woods Hole to Martha's Vineyard service. That said, the pilot program succeeded in removing approximately 1900 commercial vehicles from Woods Hole roads. There have been assertions that the SSA designed the pilot program to fail. We think that an unjust and facile charge. We are satisfied that the SSA has acted in good faith in conducting the pilot program.

Part of the difficulty of the service, as it turned out, was that a trucker who went out on the 5 a.m. ferry had a six-hour layover on Martha's Vineyard before being able to get a ferry back. Hvide offered to run an extra round trip per day without additional cost to the SSA (assuming, apparently, that the additional patronage revenue would carry the third trip) but the SSA, we think inflexibly, did not make that additional experiment. It also does not appear that reservations personnel at the SSA were alert to recommending diversion to truckers who were on standby basis at Woods Hole. Nor did the SSA make it clear that small commercial vehicles

were eligible for standby service on the New Bedford run.

The SSA proposes to run the pilot program another season, one hopes with modifications. It also appears that freight shipping habits do not change easily. Having the program available longer and on a schedule that allows a better turnaround may build patronage of the alternative service. Logically, it should be worth a freight carrier's while to avoid the heavy Cape traffic in high season. That assumes whole truck loads are bound for the Islands. In practice, a significant number of trucks that deliver goods to the Islands deliver as well to the Cape. Studies conducted for the SSA project an increase in freight traffic to the Islands at the rate of two percent a year. That is 20% over a decade. Those studies may not anticipate the future accurately. It is likely, however, that there will be some additional traffic. That traffic cannot move through Woods Hole and Hyannis without undue burden on those communities and the Cape in general.

Finally, on March 26, 2001, Seabulk International Inc. (formerly Hvide Marine) applied to the SSA for a license to run year round freight and passenger vehicle service (the latter on a no reservations, standby basis) to Martha's Vineyard and Nantucket. We do not purport to have analyzed the proposal in any detail. It shall be for the SSA to consider whether this may serve as a freight service experiment that could be conducted at no cost to the SSA.

5. Licensing. It is the SSA's responsibility to run year round freight and passenger service to the Islands. October through April are lean months, when the service runs at a loss. The Legislature foresaw that and conferred on the SSA the power to license vessels from Massachusetts ports.³ Were it otherwise, private operators could skim the cream off the fat summer season. We think the SSA must retain its licensing authority if it is to discharge its basic responsibility of providing year round service without deficits (or off-season rates) that would impose a hardship on the participating communities, particularly those on the Islands.

The SSA has in place a statement of policy relating to the licensing of private vessel service to the Islands. Within the broad criterion of public convenience and necessity, it considers: a) whether there is a demand for the additional service, i.e., is there demand for transportation from a new location or from an existing location; b) is the proposal a cream skimming operation, i.e., will it impair the fiscal soundness of the SSA's operation; c) recognition of the grandfather status of certain private carriers running service to the Island in 1973 (Hy-Line out of Hyannis and the Island Queen out of Falmouth)⁴; d) impact on the license applied for on traffic on the Islands; e) ability of the applicant to provide the service described in the application, e.g., is there an adequate landing site; f) physical impact of the service applied for on the affected communities.

³Vessels of less than 75 tons or that carry fewer than 40 passengers are exempt from the SSA licensing requirement. St. 1973, c. 942. All vessels that carry passengers must be certified by the Coast Guard.

⁴St. 1973. C. 942.

The Task Force considered whether there should be some sort of administrative review of SSA licensing decisions. We concluded that this would only encumber the procedure. Not only has the SSA established procedures for licensing, its statement of policy requires it to articulate in writing its reasons for grant or denial of a license, or the conditions placed on a license, in light of those policies. There would be no basis for overturning such a decision unless the SSA's findings and rulings showed that it had acted arbitrarily or capriciously. The remedy of a complaint in the nature of certiorari is already available to correct arbitrary and capricious conduct.

In the exercise of its discretion, we think the SSA should be generously disposed to applications for license amendments involving the upgrade of existing vessels (e.g., faster ones) that provide the same volume and level of service. If the request is to substitute a vessel that accommodates a wider range of service, e.g., a vessel that accommodates automobiles and freight trucks for a vessel that carried only passengers, the SSA may properly look to its financial interests.

6. Regional planning considerations. The SSA must be responsive to the regional planning objectives of all the affected communities, on the Islands and the mainland, to the extent those objectives can be harmonized, and always subject to the primary mission of the SSA to provide fiscally sound operation of reliable ferry service to the Islands. Reciprocally, the Task Force recognizes that the Island communities have taken steps to accommodate the Cape's planning needs.

* * *

The Task Force shall file with you a draft of legislation for the reconfiguration of the SSA.

Respectfully submitted,

Rudolph Kass, Chair
Arthur L. Desrocher
Daniel A. Flynn
Kevin O'Neil
Rita Pacheco
Antone G. Souza, Jr.
Paul F. Walsh
Rick Armstrong
Maeve Vallely Bartlett
Thomas S. Cahir
Peter Forman

Terence Kenneally

From: SMART Citizens Task Force <smartcitizenstaskforce@gmail.com>
Sent: Wednesday, June 15, 2022 12:17 PM
To: schedules
Subject: Impact of 56,000 freight trucks on Falmouth and Woods Hole residents, homes, and neighborhoods

Impact of 56,000 freight trucks on Falmouth and Woods Hole residents, homes, and neighborhoods

In 2021 there were 56,522 freight trucks carried through Falmouth and Woods Hole by the Steamship Authority. This set a new record. The previous highest number of trucks was 53,526 in 2018.

Here are some of the ways that 56,000 freight trucks are unsafe for Falmouth residents, our homes, and our neighborhoods.

1.

Heavy and noisy SSA trucks move through Falmouth between 4:45 AM and 10:45 PM daily.

Because the SSA is trying to move so many trucks through Woods Hole terminal, the SSA schedules its freight truck customers through Falmouth neighborhoods for 18 hours each day.

It is not clear when hundreds of Falmouth residents impacted by early morning and late night freight truck noise along Palmer Ave., Locust St., Woods Hole Road, Crane St., and Cowdry Road are supposed to sleep. There are serious health impacts from chronically disrupted sleep.

2.

Trucks of up to 100,000 lbs are too heavy to be able to stop in time at our children's bus stops on Woods Hole Road when Falmouth's school buses stop to pick up and drop off our children.

There are twelve to fifteen (12-15) school bus stops on Woods Hole Road alone.

See two documented incidents of trucks not stopping at our children's stopped school buses:

<https://photos.app.goo.gl/GaZnNmt7BGoBhUeE7>

<https://www.youtube.com/watch?v=ILGloosmVp0>

This situation is especially dangerous when school children are crossing to the opposite side of the street when their school bus is stopped.

3.

SSA-carried trucks haul very heavy materials such as gravel, rocks, fuel, septic, and trash that in some cases exceed gross vehicle weights of 100,000 lbs.

By how much do SSA-carried truck loads exceed maximum gross vehicle weight? No one knows, but the problem is reported to exist. The State Police reports that recent spot weight checks on Route 3 have identified trucks going to Nantucket that exceed maximum allowed gross weight.

The SSA no longer weighs its truck customers (it no longer charges by weight, but solely by length).

Spot weight checks by the State Police Truck Unit have not taken place for years at Woods Hole terminal. A recent phone call by a citizen to the State Police office in Concord MA may result in an upcoming spot check in Woods Hole and on the Vineyard.

4.

Diesel soot and high PM 2.5 levels are high in the direct vicinity of our homes and in our neighborhoods from the 56,000 diesel trucks in Falmouth and Woods Hole.

Falmouth residents are working to measure the exact particulate levels at our homes.

Ask anyone who has cleaned their home's window sills or windows along the Palmer Ave - Locust St. - Woods Hole Road - Crane St. corridor how much diesel soot reaches their home.

A network of PurpleAir PM 2.5 monitoring devices is planned to measure the extent of the PM 2.5 concentrations along the truck corridor.

5.

The noise level of the SSA's freight trucks can be ear-shattering in our neighborhoods and homes, regardless of the time of day. The trucks are especially loud during up and down grades, which are frequent on Woods Hole Road.

How loud are those trucks?

Falmouth members of the SSA Noise and Traffic Working Group (created as a noise and traffic remedy in a past Section 15A Report) have repeatedly requested for the SSA to conduct a professional traffic noise study.

The SSA refused.

What measures exist to begin to mitigate the impact of current and future freight service through Falmouth and Woods Hole to Martha's Vineyard?

- Daily sleep disruption is medically recognized to cause severe health consequences. The 5:30AM freight boat schedule from Woods Hole needs to be eliminated. The 5:30AM boat schedule can be for cars and passengers only. To the best of our knowledge, the SSA has never considered the serious health impacts (nor has the SSA ever addressed them in past

years' Section 15A Reports) when proposing its daily 5:30AM freight schedule from Woods Hole terminal and inducing freight truck customers to pass through Falmouth neighborhoods beginning at 4:45 AM and earlier;

- Spot weight checks need to be carried out more frequently by the State Police at Woods Hole and Vineyard terminals. This will help to protect the children of Falmouth at their school bus stops. To the best of our knowledge, the SSA has never requested such spot weight checks from the State Police;

- Because diesel soot and PM 2.5 are medically recognized to have long-term negative impacts on public health in the vicinity of diesel-based operations, the SSA should take every measure to reduce the health impact from its diesel truck freight operations in the vicinity of residential neighborhoods. To the best of our knowledge, the SSA has never considered those health impacts;

- A professional traffic noise study is needed in order to identify which SSA-carried freight trucks are noisiest and at what time(s) of day in Falmouth. Those trucks need to be targeted/investigated for how they can reduce their noise levels (Falmouth residents often observe seemingly similarly sized trucks that make vastly different levels of noise; age of engines, use of brakes, and other variables are likely determinants. To the best of our knowledge, the SSA has never conducted such a professional traffic noise study;

- Gravel, rock, sod, mulch, large trees and other landscaping materials, septage, trash, demolition and construction materials travel should not be traveling with "first-class" speed together with passengers and automobiles from Woods Hole terminal;

- Falmouth residents already endure too many health and public safety impacts from the SSA's freight operations. Woods Hole terminal and village are too limited in size for further expanding freight service to the Vineyard. Non-time-sensitive freight should be traveling by short-sea shipping/marine highway from off-Cape ports;

- A Request for Proposals (RFP) *without restrictions* for off-Cape short-sea shipping/marine highway service for freight to and from Martha's Vineyard is essential. The current RFP proposed by the SSA appears "designed to fail" (words of the respected Judge Kass in his report on the SSA to the governor in his Task Force Report in 2001) due to restrictions in conditions and in the RFP's point system for evaluation of proposals.

Terence Kenneally

From: Piepiora, Cynthia L - Brockton, MA <Cynthia.L.Piepiora@usps.gov>
Sent: Wednesday, June 15, 2022 12:37 PM
To: schedules
Subject: FW: Summer 2023 Schedules

From: Piepiora, Cynthia L - Brockton, MA
Sent: Wednesday, June 15, 2022 12:30 PM
Cc: Dias-Lam, Maria E - Brockton Plant, MA <maria.diaslam@usps.gov>
Subject: Summer 2023 Schedules

Good Afternoon Steamship Authority,

My name is Cynthia (Cindy) Piepiora and I am currently covering the Transportation Managers position here at the United States Postal Service here in Brockton as well as covering Wareham needs. I am currently seeking information on adding earlier boats for Summer 2023 to the islands to service the mail. When does this have to be completed by as we don't want to miss our scheduling opportunity?

Any assistance or information you can provide is greatly appreciate,

Have a great day,
Cindy Piepiora
STO/(a)Transportation & Networks
USPS Brockton, MA Logistics
(508)427-0159/0135

Petition seeks public hearing on early morning ferries

By **The Martha's Vineyard Times** - June 1, 2022



A petition has triggered the need for the Steamship Authority to call a public hearing over its 2023 schedule. — George Brennan

Woods Hole residents are forcing a public hearing on the Steamship Authority's 2023 schedule, again objecting to the 5:30 am freight ferries scheduled to go from Woods Hole to Martha's Vineyard.

Nat Trumbull, a Woods Hole resident who organized the petition drive, said he has gotten the necessary 50 signatures to require a public hearing to be called.

“We, the undersigned, are writing to renew our strenuous objection to the 5:30 am freight trip from Woods Hole proposed by the Steamship Authority concerning its 2023 freight operating schedules between Woods Hole and Martha's Vineyard as announced in the

Steamship Authority's advertisement in the Falmouth

Enterprise and on the SSA website," the petition states. "We object to the SSA scheduling of the 5:30 am early morning freight from Woods Hole to Martha's Vineyard and its multiple negative public health impacts on Falmouth and Woods Hole residents caused by predawn noise as well as the ever-increasing threats to public safety resulting from increasing freight truck traffic over Falmouth roads leading to and from Woods Hole. Alternative scheduling proposed by the Falmouth transportation committee would address this matter. The Falmouth select board has repeatedly requested that the 5:30 am freight schedule be eliminated. The consistent failure of the SSA to consider the impact of its schedules on the residents of this community is unacceptable, and must change immediately."

The petition seeks a public hearing within 14 days of the petition being submitted.

The SSA is allowing freight service between New Bedford and Nantucket after UPS failed to reserve space on Nantucket ferries during the busy summer months.

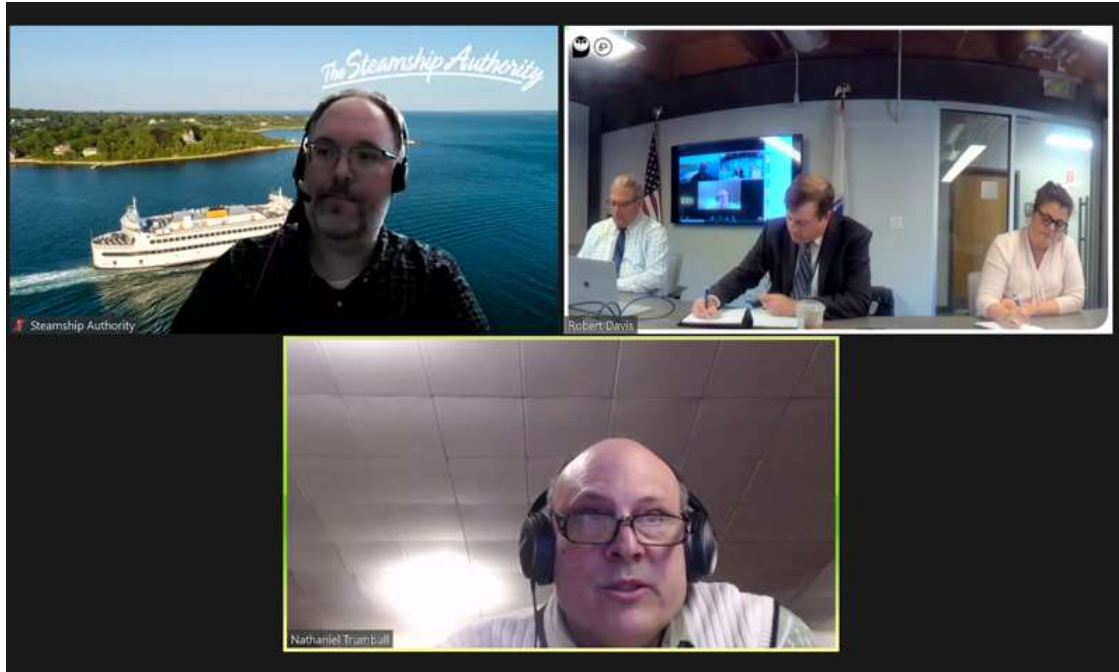
In his email asking for petition signatures, Trumbull alleges that the SSA has failed "to take adequate steps to shift non-time-sensitive Vineyard freight" through New Bedford to the Island. A request for proposals issued by the SSA has "too many conditions," Trumbull wrote.

On Wednesday, the SSA confirmed that it received the petition, and scheduled a public hearing for Wednesday, June 8, at 5 pm via Zoom.

SSA hearing gets heated

Falmouth residents expressed dismay with ferry boat administration for failing to prioritize mainland residents.

By **Abigail Rosen** - June 9, 2022



Numerous Falmouth residents testified at the Steamship Authority public hearing on Wednesday in objection to proposed changes to the ferry operating schedule for 2023.

The Steamship Authority took testimony at a public hearing on Wednesday, June 8, regarding its proposed 2023 schedule for crossings between Woods Hole and Martha's Vineyard, particularly the SSA's early morning freight runs, which launch at 5:30 am.

The public hearing drew an array of Falmouth residents who petitioned for the public hearing using a provision of the SSA's enabling act.

General manager Robert Davis said the SSA received the petition May 31 that was signed by 160 Falmouth residents who object specifically to the 5:30 am freight ferries between Woods Hole and Martha's Vineyard "only during its summer operating schedule," via the MV Governor ferry, from May 18 to Oct. 23. The authority is also proposing to continue to limit the truck size to vehicles less than 40 feet in length, a regulation adopted in 2018 to mitigate noise emitted by truck traffic near the Woods Hole terminal.

Although no particular opinions were expressed by the SSA, Davis opened the hearing emphasizing that the proposed schedule is "essentially the same operating schedules that were

approved for 2022 ... As well as the same freight operating schedules that were run in 2018, 2019, and 2021.” The same freight schedule was approved for 2020, but the schedule was modified because of COVID-19.

Falmouth resident Nathaniel Trumbull, who submitted the petition on behalf of the 160 Falmouth residents objecting to the proposed changes, expressed concerns about the “long-term health hazards from prolonged exposure” to diesel truck–emitted soot. “The 56,000 freight trucks that the SSA carried through our communities in 2021 are all diesel trucks,” he said. “We experience the diesel soot from those trucks in our air, we see the soot on our windows and windowsills, and we breathe that diesel soot.”

Trumbull said that in addition to health hazards, the proposed schedule creates public safety concerns when “18- to 20-wheel trucks carried by the Steamship can be so heavy that they are unable to stop for school buses.”

He said when he followed a truck driver to the Woods Hole terminal to ask why “he hadn’t stopped in time for a school bus that was picking up children,” the driver allegedly told him that “his load was too heavy to stop in time for that school bus.”

Trumbull is a member of the Falmouth–Woods Hole noise and traffic working group, which he said suggested to the SSA that they ask the State Police truck unit to conduct weight checks at the terminal and on the Vineyard, but does not believe the police have ever been contacted.

Falmouth petitioners also expressed concerns about inaccessibility to the hospital in the event of an emergency due to traffic backups near the Woods Hole terminal.

Falmouth resident Damien Kuffler expressed his dissatisfaction with the SSA, accusing the authority of “never [acting] in good faith and [doing] nothing but obstruct progress.”

“[The SSA has] done nothing that might show social consciousness, a moral compass, social or financial integrity,” he said.

Kuffler continued, “The Steamship Authority has provided us with nothing but lies. The public receives nothing from the SSA but complete disdain for anything except what its narrow-minded

leadership wants it to do, which is always in its own self-interest, regardless of the damage it does to the local and wider communities, as well as the environment.”

Numerous Falmouth residents spoke out about the early morning ferries.

Falmouth resident Ed Dewitt, who lives near Watson’s Corner, “a significant chokepoint” for terminal-bound trucks, quoted from SSA’s enabling act. The SSA is “to provide adequate transportation of persons and necessities of life,” he said. Dewitt took issue with the term

“necessities” of life, asserting that necessities of life are “food, shelter, medical attention, and protection from harm.”

“Hauling trash away from the Island is not a [necessity] of life activity ... hauling landscapers and their equipment back and forth on a daily basis is not a [necessity] of life activity.” Dewitt continued, “Most of what the SSA is hauling has nothing to do with the necessities of life.”

Vineyard resident Kat Monterosso testified after finding out about the hearing on NPR while waiting in standby — the next available reservation was 5:30 am June 19 — at Woods Hole terminal following an emergency off-Island appointment for her dog. Monterosso said it isn’t the first time an emergency situation has occurred, prompting her to get on the next available boat. She said she empathizes with Falmouth residents, noting “these are valid and serious issues that do need to be addressed,” but emphasized that changes to the SSA schedules would have serious repercussions for Martha’s Vineyard residents. “I’m just urging folks to please remember we live over here, year-round, and we cannot — [even] for a season — accommodate the traffic of [Vineyard-bound] tourists — that a lot of us, personally, don’t want to deal with either. We can’t be banned from our homes seven days a week.”

The SSA will consider the testimony and submit draft reports to the authority’s board members “recommending either that the authority maintains portions of its 2023 schedules as originally proposed, or that it make modifications to those proposed schedules.”

An agenda for an SSA public hearing

By **The Martha's Vineyard Times** - June 8, 2022

To the Editor:

This letter was sent to Steamship Authority General Manager Robert Davis.

We, the undersigned, are writing to renew our strenuous objection to the 5:30 am freight trip from Woods Hole proposed by the Steamship Authority, concerning its 2023 freight operating schedules between Woods Hole and Martha's Vineyard.

We object to the SSA scheduling of the 5:30 am early morning freight from Woods Hole to Martha's Vineyard and its multiple negative public health impacts on Falmouth and Woods Hole residents, caused by predawn noise as well as the ever-increasing threats to public safety resulting from increasing freight truck traffic over Falmouth roads leading to and from Woods Hole. Alternative scheduling proposed by the Falmouth transportation committee would address this matter. The Falmouth select board has repeatedly requested that the 5:30 am freight schedule be eliminated. The consistent failure of the SSA to consider the impact of its schedules on the residents of this community is unacceptable, and must change immediately.

We request that you conduct a public hearing, to be held within 14 days of receipt of this petition on the proposed 2023 freight operating schedules, per Section 15A of the Steamship Authority's Enabling Act.

In addition to the 5:30 am freight scheduling from Woods Hole, the following topics will be addressed during the public hearing:

- Failure of the Steamship Authority to address the health and safety consequences of Steamship Authority's continuing increase of freight truck traffic (56,522 freight trucks were carried through W.H. terminal in 2021, an increase of 6 percent since 2019) on Falmouth and Woods Hole residents; that includes freight truck and passenger bus idling at Woods Hole terminal, diesel soot from such a high concentration of diesel trucks, and the creation of unsafe conditions on our roadways;
- Failure of the Steamship Authority to take adequate steps to shift non-time-sensitive Vineyard freight (landscaping materials such as sod/gravel/rocks/mulch/large trees, septic, demolition, construction materials, trash) to an off-Cape port as an alternative to increasing freight capacity through Cape Cod port communities; the currently issued request for proposals for off-Cape service appears "designed to fail," and has too many restrictive conditions; for example, the request bans the future off-Cape freight carrier from taking automobiles to and from the Vineyard in the event of extra space on the carrier's freight decks;
- Failure of the Steamship Authority to address in any significant way traffic backup and parking issues in Woods Hole village;
- Failure of the Steamship Authority to limit in any significant way its use of the northernmost slip (No. 3) at Woods Hole terminal, despite the completion of the Southernmost (No. 1); we observe that the No. 3 slip is being used as actively as the other two slips; it was promised that the No. 3 slip would only be used actively on an exceptional basis;
- Failure of the Steamship Authority to negotiate an agreement with the town of Falmouth to cap the growth of the number of freight trips it will operate from Woods Hole village (the town of Barnstable has had such an agreement in place since 1997);
- Failure of the Steamship Authority to convert its passenger bus fleet from diesel to electric; the SSA currently does not have any electric buses; in comparison, Vineyard Transit Authority already operates 16 electric buses;
- Other SSA-related topics of concern to Falmouth residents.

Nathaniel Trumbull

On behalf of 160 Falmouth residents

CAPE COD TIMES

NEWS

Falmouth residents express outrage over inaction, Steamship Authority schedule



Asad Jung

Cape Cod Times

Published 5:00 a.m. ET June 11, 2022

FALMOUTH — Several Falmouth residents expressed frustration with the Woods Hole, Martha's Vineyard and Nantucket Steamship Authority during a public meeting Wednesday saying they had been talking about the same nuisance issues for several years with no results.

The residents want the authority to amend its 2023 schedule, specifically a 5:30 a.m. freight service between Woods Hole and Martha's Vineyard. The early morning freight service has negatively affected public health, including noise and public safety factors from excessive traffic, according to a petition signed by 160 town residents.

"Falmouth is a port community, and actually as the Steamship's largest port community, is totally disenfranchised from any decision making related to the Steamship Authority," resident Nathaniel Trumbull said.

Trumbull, also a member of the Southeast Massachusetts Regional Transportation (SMART) Citizens Task Force, filed a public nuisance complaint with Attorney General Maura Healey's office in January regarding excessive automobile traffic in Falmouth.

In a phone interview with the Times, he said Wednesday's event was the sixth public hearing regarding the 5:30 a.m. freight service since the authority began the service in 2012.

Requests to cease 5:30 a.m. freight trips ignored, according to citizen complaints

"Our request has been ignored each time," Trumbull said.

Other people who supported the request for a schedule change were Falmouth Select Board Chair Doug Brown, who spoke briefly at the hearing, and state Sen. Susan Moran, who provided written testimony.

During the hearing, Trumbull said that the early morning freight service routinely disturbs the sleep of Falmouth residents. He also spoke about the general increase in traffic in Falmouth due to authority service, including backups near Falmouth Hospital.

“Since when are commercial interests placed above public safety interests?” he said.

The state Legislature created the authority in 1960. Its purpose is to provide for “adequate transportation of persons and necessities of life for the Islands of Nantucket and Martha's Vineyard.”

The authority now operates a boat line between the ports of Woods Hole in Falmouth, and Hyannis, to the islands of Martha's Vineyard and Nantucket. It employs about 750 workers during the peak season and generates annual revenue of about \$100 million, according to the authority website.

At Wednesday's hearing, speakers cited the dangers of the increasing traffic caused by authority operations.

Kristin Alexandersaid attempting to pull out of her driveway into freight truck traffic was akin to risking her life. She asked if the authority would take responsibility for the traffic, since in the past it had “washed their hands of it.”

More: Third of Steamship Authority's fleet approaching the end of their lifespan

“I would like to hear some answers,” she said.

Falmouth resident Ed Dewitt said that the authority has exceeded its purpose since most of the Authority's services have nothing to do with “the necessities of life.”

In response, a meeting with attorney general officials and

A representative of the attorney general's office said that they were aware of the Falmouth residents' concerns and have met with them.

The authority plans to prepare a report and present recommended 2023 schedules to its board. However, the authority doesn't have a timeline for when it will complete its report, Communication Director Sean Driscoll said.

Earlier this week, a consultant's report indicated that three of the authority's 10 vessels will approach the end of their useful life within the next five years

The three vessels, built in the early 1980s, mostly transport freight, not passengers, officials said.

https://www.capenews.net/falmouth/opinion/falmouth-must-stand-up-for-falmouth---letter/article_cf6fc019-5d62-5558-9a94-734b76caf828.html

Falmouth Must Stand Up For Falmouth - Letter

May 27, 2022

Home / Falmouth / Falmouth Opinion

It has been a frustrating battle for Falmouth residents requesting the Steamship Authority to stop its 5:30 AM freight boat and the accompanying freight traffic truck that wakes citizens from the Bourne Bridge to Woods Hole. Every year the authority rejects these resident requests. Similar entreaties from the Falmouth Select Board are routinely ignored.

Last year, the Falmouth Transportation Committee identified time slots later in the day that could be used by the SSA to handle freight traffic currently departing at 5:30 AM. The SSA summarily dismissed this information. In trying to negotiate the SSA off its rigid no-change position, Falmouth has a bargaining chip that it has yet to use:

The Town of Falmouth owns the parking lot from Church Street to Nobska Road and leases it to the SSA.

Vineyard residents currently pay the SSA \$1,200 for each long-term parking permit at that parking lot. There is always a waiting list for those permits. The town leases the parking lot to the SSA for 25 percent of the revenue the SSA makes from it.

With select board approval, the town manager renewed the lease a year ago. That lease will expire on December 31, 2023. It is essential that the next renewal be conditioned on the SSA's elimination of the 5:30 AM freight trips from Woods Hole.

Putting aside the disfavorable terms of the current lease, the only way to make progress on restraining the SSA is to hit it where it hurts, in its finances. The SSA needs the parking lot. Falmouth and Woods Hole need relief from the disruptions and public health consequences of the 5:30 AM trips. Make a better deal!

Falmouth must stand up for Falmouth. With the support of the select board, our new town manager must be more aggressive in bargaining for change in SSA practices. The parking lot lease is a potentially powerful asset to use in forcing these changes from an entity that thus far has shown little or no concern for the people of our town.

Albert E. Fitzelle

Glendon Road

Woods Hole

https://www.capenews.net/falmouth/opinion/limited-new-bedford-freight-no-relief---letter/article_a1081d18-cf8f-564b-82a3-9e74644cfe16.html

Limited New Bedford Freight No Relief - Letter

May 6, 2022

Home / Falmouth / Falmouth Opinion

I have been thinking a lot about the truck traffic on Locust Street-Woods Hole Road since reading that the Steamship Authority is seeking bids for only two truck ferries a day to Martha's Vineyard from an alternate New Bedford port. That proposal, if I read it correctly, barely addresses the problem on Locust Street where heavy, long-haul trucks thunder past hourly, all day and into the evening, vibrating the foundations of our homes as well as our eardrums. And, who knows what damage the diesel fuel they use is doing to air quality and the earth's climate.

In light of the authority's limited offer of relief from a New Bedford port, we must ask that it also restructure its truck rates so as to discourage the long-haul trucks that will otherwise continue to use the Woods Hole route to the Vineyard. Boosting the rates to reflect the environmental impact of these trucks on the community would give the shippers a financial incentive to send smaller, quieter vehicles to Woods Hole.

Ann Sears

Locust Street

Falmouth

https://www.capenews.net/falmouth/opinion/island-communities-control-our-port---letter/article_3701bbc2-152a-53ed-b229-fe14d384b1e0.html

Island Communities Control Our Port - Letter

Jun 3, 2022

Home / Falmouth / Falmouth Opinion

A recent story in the Sunday Globe titled “Boston Reforms Hampered by State Oversight” describes the ways the city is limited in its policy-making by state legislative restrictions on home rule.

The article suggests comparisons to ways in which Falmouth’s hands are tied in dealing with the Steamship Authority. Mainland port communities like Falmouth are directly degraded by actions of the Authority. The SSA, exempt from local planning and zoning, steadily expands its real estate holdings and pays no taxes to Falmouth. The SSA ignores repeated requests from the Falmouth Select Board to eliminate early morning freight trucks through residential neighborhoods with 5:30 AM freight trips from Woods Hole.

Martha’s Vineyard in 2021 had 56,522 freight trucks carried by the SSA through Woods Hole and Falmouth. Those trucks pollute our air, threaten our children at their school bus stops, and disturb residents day and night. The growth of freight trucks carrying Martha’s Vineyard’s trash, demolition materials, landscaping materials, septic waste, and other non-time-sensitive freight through Falmouth’s residential neighborhoods continues unchecked.

Massachusetts legislators created the SSA, defined its powers, and set up a governing system that empowered island communities and handcuffed mainland communities. Island communities essentially control our mainland port towns. The island-controlled SSA damages our neighborhoods and ignores local governing bodies while avoiding tax contributions.

Our situation is actually worse than the local rule restrictions in Boston detailed in the Globe article. At least with local rule, there is a mechanism to petition the state, the home rule petition, for authority to do certain things, like add rent control in Boston. It’s not a closed system like the SSA.

Falmouth must beg for approval for its requests from the SSA board, where the islands hold a complete veto. At least with home rule, a city or town has a chance to get a favorable disposition from the state.

With the SSA the state recuses itself from the decision-making process and gives complete authority to two representatives—one from each island, comprising 70 percent of the SSA board vote.

This summer the SSA will operate 62 trips daily from 5:30 AM to 10:15 PM through Woods Hole. That is the equivalent of a surge of cars and freight trucks that occurs every 16 minutes in Woods Hole and Falmouth.

Good faith efforts by many local citizens and organizations to work out compromises with the SSA have failed. Senator Susan Moran's proposed legislation to change the voting system on the SSA board has not been supported politically, and at times has triggered derisive, divisive, and dismissive commentary from Nantucket and Martha's Vineyard leaders. Change seems impossible.

Boston at least has a chance of gaining the authority it needs to make positive policy changes that will improve the city. Falmouth, on the other hand, is captured by a system that leaves it powerless.

Without legislative attention to the outdated provisions of the SSA Enabling Act, mainland port communities will continue to be forced to fruitlessly plead their case to a governing body that has proven it will not listen.

We hope our select board and our representatives on Beacon Hill will acknowledge the unfairness of this system, and begin to work for change.

Nathaniel Trumbull

Church Street

Woods Hole

https://www.capenews.net/falmouth/opinion/health-issues-linked-to-air-pollution---letter/article_2531b71d-9afe-5afb-ac3e-20c15fa1e2af.html

Health Issues Linked To Air Pollution - Letter

Apr 22, 2022

Home / Falmouth / Falmouth Opinion

Numerous studies have shown that even small amounts of constant air pollution can contribute to chronic and fatal health issues including heart attacks, diabetes, cognitive issues and bone diseases. I urge all Steamship Authority port residents to reach out to the Steamship Authority and insist that they upgrade their fleets of ancient buses and outdated vessels.

The increasing growth of the islands and subsequent rise in demand including car, human, freight and product transportation is a threat to the health of residents of Woods Hole, Falmouth, Vineyard Haven, Oak Bluffs, Hyannis and Nantucket. The Steamship Authority mandate is to operate for the well-being of the people of the commonwealth. Whether an islander, an SSA employee, a tourist, or a port resident, we would all benefit from less air pollution.

Pam Stark

Little Harbor Road

Woods Hole

APPENDIX D



Woods Hole, Martha's Vineyard and Nantucket Steamship Authority

TO: Ed DeWitt, Chair
Falmouth Transportation Management Committee

FROM: Robert Davis, General Manager *Rd*

DATE: April 19, 2021

SUBJECT: The SSA's Early Morning Operations at Its Woods Hole Terminal

In addition to the SSA's reports on its proposed operating schedules and the approved minutes of the SSA's Woods Hole/Falmouth Noise and Traffic Mitigation Working Group, which Steve Sayers provided you on March 31, 2021, as well as the information that you requested regarding the SSA's freight operations and options, which I provided you this past Friday, I thought it would be helpful if I were to provide you with the following information regarding Nat Trumbull's request for the Town of Falmouth to ban truck use of Crane Street and Cowdry Road from 10:00 p.m. to 5:30 a.m.

History of the SSA's Early Morning Trips from Woods Hole

The history of the SSA's early morning trips from Woods Hole is described in the previous reports it has issued on its proposed 2018 Winter and Spring Operating Schedules, its proposed 2018 Summer Operating Schedules, its proposed 2020 Summer Operating Schedules, and its proposed 2021 Summer Operating Schedules, which already have been provided to the Committee. In summary:

- Until 2007, the SSA's first regularly scheduled trip from Woods Hole was a freight trip that left at 6:15 a.m. that was designated as a hazardous cargo trip on Mondays through Fridays throughout the year (as well as on Saturdays during the summer operating schedules).
- Since 2007, the SSA has regularly scheduled the first trip of the *Island Home* (or a substitute ferry) to leave Woods Hole at 6:00 a.m., the same time that the *Martha's Vineyard* (or another substitute ferry) historically has made (and continues to make) its first daily sailing from Vineyard Haven.

- In September 2011, the SSA tried out a revised schedule for the *Governor* on a trial basis, having its first trip leave Woods Hole at 5:45 a.m. instead of 7:30 a.m. through the remainder of the 2011 Late Summer Operating Schedule.
- Since 2012, the SSA has regularly scheduled the first trip of the *Governor* to leave Woods Hole at 5:30 a.m. during the summer operating schedules.
- In 2013, the SSA began regularly scheduling its first freight trip to leave Woods Hole at 5:30 a.m. during the spring operating schedules as well, but for the reasons described in its report on its proposed 2018 Winter and Spring Operating Schedules, this 5:30 a.m. trip has not been operated during any of the SSA's spring operating schedules since 2017.
- In 2015, the SSA also regularly scheduled its first freight trip to leave Woods Hole at 5:30 a.m. during the fall operating schedule. However, in 2016 the SSA stopped operating this trip during the fall operating schedule on December 8, 2016; in 2017 the SSA stopped operating this trip on October 28, 2017; and this trip has not been operated during any of the SSA's fall operating schedules since then.
- By contrast, in its report on its proposed 2018 Summer Operating Schedules, the SSA concluded that it could not continue to fulfill its statutory obligation of providing adequate transportation for the island of Martha's Vineyard during its summer operating schedules without continuing to operate its 5:30 a.m. freight trip from Woods Hole. However, in order to mitigate the impact of that trip on Woods Hole residents, it adopted certain new operating policies for that trip beginning in 2018, and over the past few years has adopted additional measures to supplement those policies, both of which are described below.
- Since 2018, the SSA has ran essentially the same summer operating schedules,¹ and it has approved them again for 2021 for the period from May 19, 2021 through October 18, 2021.

The SSA's Efforts to Mitigate Noise from Its Early Morning Operations at the Woods Hole Terminal

Over the past several years, the SSA has intensified its efforts to reduce early morning noise at the Woods Hole terminal. The list of actions that have been taken include:

- The SSA changed its methods of staging trucks at the terminal during the early morning so they do not have to back up (or use their backup alarms) when being staged before being

¹ Except that, due to the emergency created by the COVID-19 pandemic, beginning March 22, 2020, the SSA modified its operating schedules to reduce the amount of its service from what had been originally approved for that year. As a result, instead of beginning to operate the 5:30 a.m. freight trip from Woods Hole last year on May 14, 2020, the SSA did not begin to operate it until June 17, 2020.

loaded onto the ferries. As a result, the use of trucks' backup alarms has been eliminated almost entirely.

- The SSA stopped assigning the *Katama*, *Gay Head* or *Sankaty* to operate the 5:30 a.m. freight trip, as all of those boats require trucks to back up, and use their backup alarms, when they are being loaded onto those boats. The SSA now assigns only the *Governor*, *Woods Hole* or another drive-through ferry to run that 5:30 a.m. freight trip, because trucks drive forward onto those boats when they are loaded.
- The SSA has limited the size of the trucks it carries on its 5:30 a.m. freight trip from Woods Hole to trucks that are less than 40 feet in length, so that less noise is generated by the trucks that drive to the SSA's Woods Hole terminal in the early morning hours.
- During the summer when the SSA operates its 5:30 a.m. freight boat from Woods Hole (mid-May through mid-October), the SSA prohibits trucks (whether traveling with reservations or on standby) from arriving at the Woods Hole terminal prior to **6:30 a.m.**, except as follows:
 - Trucks with reservations for the 5:30 a.m. trip may arrive at the terminal beginning at **5:10 a.m.**
 - Trucks with reservations for the 6:00 a.m. trip may arrive at the terminal beginning at **5:30 a.m.**
 - Trucks with reservations for the 6:30 a.m. and 6:45 a.m. trips may arrive at the terminal beginning at **6:00 a.m.**
 - Trucks with reservations for the 7:00 a.m. trip may arrive at the terminal beginning at **6:15 a.m.**²
- The SSA has added a message to its variable message sign on Route 28 in the early morning hours advising truck drivers traveling down the highway about the SSA's policy prohibiting early arrivals at the Woods Hole terminal. Currently the following messages are programmed to appear on that sign:

midnight to 6:15 a.m.	No Trucks Until 30 Mins. Before Trip
6:15 a.m. to 9:30 p.m.	COVID-19 Facemasks Required
9:30 p.m. to midnight	Sign is blank.

² During the rest of the year when its first trip from Woods Hole is at 6:00 a.m. (mid-October through mid-May), the SSA prohibits trucks (whether traveling with reservations or on standby) from arriving at the Woods Hole terminal prior to **6:30 a.m.**, except as follows:

- Trucks with reservations for the 6:00 a.m. trip may arrive at the terminal beginning at **5:30 a.m.**
- Trucks with reservations for the 6:30 a.m. trip may arrive at the terminal beginning at **6:00 a.m.**

When the summer operating schedule begins on May 19, 2021, the following messages will be programmed to appear on that sign:

midnight to 5:00 a.m.	No Trucks Until 20 Mins. Before Trip
5:00 a.m. to 6:15 a.m.	No Trucks Until 30 Mins. Before Trip
6:15 a.m. to 9:30 p.m.	COVID-19 Facemasks Required
9:30 p.m. to midnight	Sign is blank.

- The SSA periodically sends letters to its freight shippers reminding them about the SSA's terminal traffic and noise mitigation policies and asking them to review those policies with their truck drivers. I am enclosing the most recent letter, dated March 17, 2021, that the SSA has sent to its freight shippers. It reminds them, among other things, that their truck drivers are prohibited from arriving early at the Woods Hole terminal in the early morning, that they are not allowed to idle their engines unnecessarily while they are at the terminal, that they should obey the speed limit as they drive down Woods Hole Road, and that they should not to use their Jake brakes while they are on the road.

**Additional Measures Taken After Consideration by the SSA's
Woods Hole/Falmouth Noise and Traffic Mitigation Working Group**

In addition, on October 15, 2019, the SSA established a Woods Hole/Falmouth Noise and Traffic Mitigation Working Group (the "Working Group"), which now has representatives from the Dukes County Commissioners, the Martha's Vineyard Commission and the Towns of Falmouth, Oak Bluffs and Tisbury to focus exclusively on identifying and developing reasonable and practical ways to monitor and enforce compliance with the SSA's current noise mitigation policies as well as identifying and developing additional ways to mitigate traffic issues arising from the SSA's Woods Hole ferry terminal operations.

In February 2020, even though the island communities had not yet appointed their representatives to the Working Group, the SSA and Falmouth Working Group members began working together to attempt to find ways to mitigate traffic and noise issues arising from the SSA's Woods Hole ferry terminal operations. This work included:

- Discussing with Martha's Vineyard freight truck driver Steve Araujo noise and other traffic issues associated with freight trucks traveling on Woods Hole Road.
- Discussing with Falmouth Police Chief Edward Dunne possible ways how the Town of Falmouth can enhance enforcement of both the speed limit on Woods Hole Road and the no idling law on the SSA's Woods Hole terminal property.
- Revising the version of the SSA's periodic letter to its regular freight customers, advising them, among other things, that the SSA will be strictly enforcing its terminal traffic and noise mitigation policies and that they will forfeit their reservations if any of their drivers intentionally or repeatedly violate them.

- Working with the SSA to have new signs posted at the Woods Hole terminal telling people that the idling of engines in violation of the Massachusetts General Laws is prohibited and also telling them what the penalties are for violating the law.
- Agreeing with the SSA's creation of a new SSA email address to receive emails from the public with specific complaints about excessive noise and traffic issues in Woods Hole due to the SSA's ferry operations, which is Whtraffic@steamshipauthority.com.
- Making a suggestion, which the SSA adopted, that the SSA add "Woods Hole Traffic" to the list of subjects on the SSA's Customer Feedback webpage on its website about which the public can contact the SSA via its website.
- Agreeing with the SSA's efforts to have its Operations and Communications Center monitor the Woods Hole terminal early in the morning to see if any trucks arrive at the terminal earlier than they are allowed. That information is provided to the SSA's Director of Shoreside Operations, Alison Fletcher, who is then responsible for contacting the freight customer to ensure their compliance with the SSA's allowed arrival times for the Woods Hole terminal.³
- Making a suggestion, which the SSA adopted, that the SSA add language to its vehicle reservation confirmation emails asking all of the SSA's automobile and freight customers to obey all posted speed limits and all other traffic laws, signs and restrictions, and to drive at all times in a safe and courteous manner towards other drivers, bicyclists, pedestrians and residents of the SSA's surrounding communities. Further, in the SSA's vehicle reservation confirmation emails it sends to its freight customers who are leaving on early morning trips from Woods Hole, the SSA now also reminds those customers again of its early morning arrival policies.

A few months later, despite the difficulties imposed by the COVID-19 pandemic, the island communities similarly appointed their representatives to the Working Group. As a result, since August 2021, the Working Group has been meeting regularly in their representatives' efforts to work collectively on attempting to find more short-term measures that can be taken to mitigate

³ The SSA created the position of "Director of Shoreside Operations" in response to the report issued by the independent management consultants who studied the SSA's operations in 2018. Previously, responsibility for both the SSA's shoreside operations and its marine operations fell to the SSA's Operations Manager. In 2019, the duties of that position were divided between the position now held by Ms. Fletcher and another new position, "Director of Marine Operations." As a result, the SSA now has a person in management who is dedicated to its shoreside operations and can better address issues arising from those operations.

noise and traffic issues arising from the SSA's Woods Hole terminal operations.⁴ This work has included:

- Discussing with SSA freight customers Stephen Araujo of John Keene Excavation, Greg Carroll of Bruno's Rolloff, and Patrick Cleary of Cape Cod Express what suggestions they might have to address noise and traffic issues associated with freight trucks in Wood Hole, such as trucks that are especially loud when they are driving on Woods Hole Road and engage in excessive speeding and Jake braking.
- Reviewing reports from Falmouth Chief of Police Edward A. Dunne on the speed of vehicles traveling on Woods Hole Road based upon speed monitoring devices that had been installed there in May 2021. The report for the device that had been installed at 460 Woods Hole Road, where the speed limit is 40 miles per hour, showed that, while fewer than 1% of the vehicles were traveling over the enforcement limit (which is at more than 10 miles per hour over the speed limit), there was still a high percentage of vehicles that were speeding; and the report for the device that had been installed at 260 Woods Hole Road, just south of the Quissett traffic light where the speed limit is 35 miles per hour, showed that 4.9% of the vehicles were traveling over the enforcement limit here and that more vehicles were speeding in one direction, which the Working Group assumed was the northbound lane as they were trying to get through the intersection before the traffic light turned red.
- Approving the SSA's mailing of a postcard by Every Door Direct Mail (EDDS) to Woods Hole and Falmouth households informing them of the SSA's dedicated email address for emailing complaints to the SSA about issues related to the SSA's Woods Hole terminal operations. In November 2020, the postcard was sent to approximately 3,500 residential, business and PO box mailing addresses not only in Woods Hole, but also in the western area of Falmouth along Woods Hole Road, Locust Street, North Main Street and Palmer Avenue from Woods Hole to Jones Road.
- Making a suggestion, which the SSA adopted, for the SSA to make changes to its website to make it easier for people to submit complaints and comments to the SSA via the website.
- Reviewing copies of emails received by the SSA at its dedicated email address whtraffic@steamshipauthority.com (except for emails sent by Working Group members due to constraints of the Open Meeting Law) and discussing the SSA's responses to those emails. In addition, discussing issues raised by Working Group members in emails sent to whtraffic@steamshipauthority.com and the SSA's attempts to address those issues.

⁴ The contributions of the Working Group's island representatives go beyond their participation in the Working Group's meetings. In their respective communities, they are raising awareness of the burdens that the SSA's freight service impose on Woods Hole/Falmouth residents and are increasing the sensitivity of their appointing authorities and constituents to these issues.

- Discussing how the SSA can prevent traffic backups on Woods Hole Road that are due to a large number of island residents arriving at the Woods Hole terminal to travel on a standby basis back to the island. These traffic backups occurred in September 2020 when the SSA had closed the standby line earlier in the day when there was no more room at the terminal to stage any more standby customers and told all of those customers to come back at the same time. That discussion has prompted the SSA to investigate a long-term solution to the problem and, until a better solution is found, to adopt a new procedure for reopening the standby line at the Woods Hole terminal after it is closed earlier in the day which requires standby customers who were previously turned away that day to arrive at staggered times after the standby line is reopened.
- Monitoring the SSA's enforcement of its early arrival policies at the Woods Hole terminal by reviewing reports of how many trucks had arrived early for their early morning trips since the last time the Working Group had met, and discussing how the SSA can improve its freight customers' compliance with its early arrival policies. In this regard, whenever a freight customer's driver arrives earlier than allowed, the SSA emails that customer advising it of the violation and reminding it that it will forfeit its reservations if any of its drivers intentionally or repeatedly violate the SSA's early arrival policy. A copy of the report for the first three months of 2021 that will be reviewed by the Working Group at their next scheduled meeting on April 28, 2021 is attached. It indicates that, during that three-month period, the SSA achieved 97.5% compliance with its early arrival policy by truck drivers who traveled on its 6:00 a.m. trips, 95.5% compliance by those who traveled on its 6:30 a.m. trips, and 90.1% compliance by those who traveled on its 7:00 a.m. trips., and that the vast majority of the drivers who did arrive earlier than allowed did so by only a few minutes. However, the SSA's goal is 100% compliance with its early arrival policy and, as Mike Mauro of the Martha's Vineyard Commission said at the Working Group's August 26, 2020 meeting, the SSA needs to keep engraining its policies into the truck drivers' heads so that, as time goes on, they all will learn to enter the Woods Hole community with caution.
- Asking the SSA to address noise from its employees who ride motorcycles to and from the Woods Hole terminal, which the SSA has done by putting a notice at the terminal asking SSA employees who commute to work by motorcycle to be quieter when they go to and from the terminal.
- Advising Greg Carroll of Bruno's Rolloff, Inc. and Carroll's of issues regarding the amount of noise of his companies' trash trucks as they leave Woods Hole terminal in the early morning hours, to which Mr. Carroll has responded by, among other things, having his companies' louder trucks make their trips off-island later in the day and personally observing the situation when the trucks are going up Woods Hole Road from the terminal.
- Asking the SSA to address situations when truck drivers are reported to have been speeding or otherwise generating more noise than usual, which the SSA has done by contacting those truck drivers and/or their employers to make certain the truck drivers know what their responsibilities are when driving to and from the Woods Hole terminal.

- Inviting Cape Cod Commission (CCC) Transportation Program Manager Steven Tupper to provide an overview of the CCC's traffic counting program and to speak generally about the traffic counting activities the CCC has conducted and, more specifically, some of the counts the CCC has done on Woods Hole Road.
- Encouraging the SSA's initiative for its Director of Shoreside Operations and Woods Hole Terminal Manager go to specific places on Woods Hole Road that Woods Hole residents consider to be problem areas and assess what is taking place and consider what measures might be taken to reduce the amount of noise that is generated by freight trucks at those locations. The Working Group discussed how some truck drivers may not realize that how they are driving in certain areas may be causing problems and will address these issues when they are educated about them, while other situations may require greater enforcement of speed limits by the appropriate authorities.
- Inviting Cape Cod Commission (CCC) Transportation Program Manager Steven Tupper a second time to provide information and advice on how to approach MassDOT to provide additional no speeding or similar signs on Woods Hole Road. Mr. Tupper's suggestions led to the Falmouth Select Board authorizing the Falmouth Town Manager to send a letter to MassDOT, with the SSA's strong support, asking for the following with respect to Woods Hole Road:
 - enhanced roadway signage to control vehicle speed;
 - signage alerting trucks that "jake braking" is prohibited;
 - consideration of taking enforcement action on overweight trucks;
 - consideration for MassDOT proceeding with an analysis to result in a lowering of posted vehicle speeds on the road and, in the interim, asking that MassDOT consider lowering the current posted speed limit to 35mph as one approaches the Town's existing Woods Hole Fire Station and continuing into Woods Hole village.

I hope this list of efforts the SSA has made over the past few years to mitigate noise and traffic issues arising from its Woods Hole ferry terminal operations demonstrates that the SSA is sincere and committed to addressing all of these issues as best it can on an ongoing and sustained basis. The SSA also believes that having Working Group representatives from both Falmouth and Martha's Vineyard work with each other to assist the SSA in understanding the concerns of Woods Hole residents and identifying ways to respond to them has helped foster a spirit of cooperation between the mainland and island communities that in the future will help bridge whatever differences they may have. Of course, the SSA always welcomes suggestions from other sources, particularly your Committee, for additional ways that the SSA can monitor and enforce compliance with its current policies, as well as new ways it can mitigate the noise and traffic problems in Woods Hole.

APPENDIX E



Woods Hole, Martha's Vineyard and Nantucket Steamship Authority

June 16, 2022

Dear Valued Freight Carrier:

Thank you for your continued patronage onboard the Steamship Authority's ferries. Please take this opportunity to once again review our terminal traffic and noise mitigation policies with your truck drivers. The Steamship Authority will be strictly enforcing those policies, and you will forfeit your reservations if any of your drivers intentionally or repeatedly violate them. These policies include restrictions (described below) on how early trucks can arrive at the Woods Hole terminal in the morning.

- Truck drivers are prohibited from idling their trucks' engines at any of our ferry terminals for more than five minutes in violation of chapter 90, section 16A, of the Massachusetts General Laws.
- Trucks are not to be backed up on terminal property except when necessary to stage them for boarding or to load them onto a ferry, with the permission of the Terminal Agent. In addition, when trucks are being backed up on terminal property, their back-up alarms may not be excessively loud, and should be adjusted to the extent possible so that they are only loud enough for their intended safety purposes.
- When driving to or from any of our ferry terminals, truck drivers are required to obey all posted speed limits and all other traffic laws, signs and restrictions, including stopping when required at all pedestrian and bicycle crossings. Truck drivers also should drive at all times in a safe and courteous manner towards other drivers, bicyclists, and residents of our surrounding communities.
- When driving on Woods Hole Road, drivers should reduce their speed well in advance of curves and downhill stretches so that they can minimize using their engine compression brakes (Jake brakes).
- Truck drivers may not stop or park alongside highways or roads where it is illegal to do so, such as alongside Woods Hole Road.
- Trucks when coming onto Steamship property should not cross the double yellow line until safely on Steamship property. This is best noted by the entrance to the employee parking lot.

In the future, freight carriers will not be allowed to make reservations for early-morning trips to or from Woods Hole for any truck that has a record of excessive noise on Woods Hole Road, whether the noise is due to the driver's use of the truck's engine compression brakes or due to the truck's age and/or lack of proper maintenance.

During the 2022 Summer Operating Schedules from June 22, 2022 to September 7, 2022, trucks (whether traveling with reservations or on standby) are **prohibited** from arriving at the Woods Hole terminal prior to **6:30 a.m.**, except as follows:

- Trucks with reservations for 5:30 a.m. trip may arrive beginning at **5:10 a.m.**
- Trucks with reservations for the 6:00 a.m. trip may arrive beginning at **5:30 a.m.**
- Trucks with reservations for the 6:30 a.m. and 6:45 a.m. trips may arrive at the terminal beginning at **6:00 a.m.**
- Trucks with reservations for the 7:00 a.m. trip may arrive at the terminal beginning at **6:15 a.m.**

Trucks that arrive at the Woods Hole terminal earlier than the above times will not be allowed to travel on standby that day and/or may forfeit their reservations.

In addition, unless specifically approved by a Truck Coordinator in the Steamship Authority's Mashpee Reservations Office (for vehicles with reservations) or the Terminal Agent at the departure terminal (for vehicles traveling without reservations), the weight of vehicles traveling on the Steamship Authority's vessels may not exceed: (a) 52,000 pounds for vehicles up to thirty (30) feet long; or (b) 86,000 pounds for vehicles thirty (30) feet or more in length. Vehicles in excess of the above weights may be accepted for travel only if the customer complies with all conditions as may be required by the Authority for such travel.

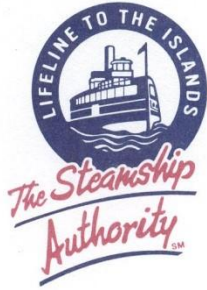
All travel on Steamship Authority ferries and use of its facilities are subject to these policies as well as the Steamship Authority's other published tariffs, policies and regulations, including its Customer Policy Handbook and its Rules and Regulations Governing Public Conduct on Terminal Property, both of which are posted on the SSA's website. If you choose to travel with us and/or use our facilities, you will be agreeing to abide by all of the terms and conditions of these policies.

We thank you for all of your assistance and cooperation in respecting our neighbors in all of our port communities by reducing the amount of noise generated by your trucks as much as possible. We also thank you for your continued business with the Steamship Authority. If you have any questions or concerns, please feel free to contact me at (508) 548-5011, ext. 219, or any of our Terminal Managers.

Sincerely,



Alison Fletcher
Director of Shoreside Operations



Woods Hole, Martha's Vineyard and Nantucket Steamship Authority

May 16, 2022

Dear Valued Freight Carrier:

Thank you for your continued patronage onboard the Steamship Authority's ferries. Please take this opportunity to once again review our terminal traffic and noise mitigation policies with your truck drivers. The Steamship Authority will be strictly enforcing those policies, and you will forfeit your reservations if any of your drivers intentionally or repeatedly violate them. These policies include restrictions (described below) on how early trucks can arrive at the Woods Hole terminal in the morning.

- Truck drivers are prohibited from idling their trucks' engines at any of our ferry terminals for more than five minutes in violation of chapter 90, section 16A, of the Massachusetts General Laws.
- Trucks are not to be backed up on terminal property except when necessary to stage them for boarding or to load them onto a ferry, with the permission of the Terminal Agent. In addition, when trucks are being backed up on terminal property, their back-up alarms may not be excessively loud, and should be adjusted to the extent possible so that they are only loud enough for their intended safety purposes.
- When driving to or from any of our ferry terminals, truck drivers are required to obey all posted speed limits and all other traffic laws, signs and restrictions, including stopping when required at all pedestrian and bicycle crossings. Truck drivers also should drive at all times in a safe and courteous manner towards other drivers, bicyclists, and residents of our surrounding communities.
- When driving on Woods Hole Road, drivers should reduce their speed well in advance of curves and downhill stretches so that they can minimize using their engine compression brakes (Jake brakes).
- Truck drivers may not stop or park alongside highways or roads where it is illegal to do so, such as alongside Woods Hole Road.
- Trucks when coming onto Steamship property should not cross the double yellow line until safely on Steamship property. This is best noted by the entrance to the employee parking lot.

In the future, freight carriers will not be allowed to make reservations for early-morning trips to or from Woods Hole for any truck that has a record of excessive noise on Woods Hole Road, whether the noise is due to the driver's use of the truck's engine compression brakes or due to the truck's age and/or lack of proper maintenance.

During the 2022 Early Summer Operating Schedules from May 17, 2022 to June 21, 2022 , trucks (whether traveling with reservations or on standby) are **prohibited** from arriving at the Woods Hole terminal prior to **6:30 a.m.**, except as follows:

- Trucks with reservations for 5:30 a.m. trip may arrive beginning at **5:10 a.m.**
- Trucks with reservations for the 6:00 a.m. trip may arrive beginning at **5:30 a.m.**
- Trucks with reservations for the 6:30 a.m. and 6:45 a.m. trips may arrive at the terminal beginning at **6:00 a.m.**
- Trucks with reservations for the 7:00 a.m. trip may arrive at the terminal beginning at **6:15 a.m.**

Trucks that arrive at the Woods Hole terminal earlier than the above times will not be allowed to travel on standby that day and/or may forfeit their reservations.

In addition, unless specifically approved by a Truck Coordinator in the Steamship Authority's Mashpee Reservations Office (for vehicles with reservations) or the Terminal Agent at the departure terminal (for vehicles traveling without reservations), the weight of vehicles traveling on the Steamship Authority's vessels may not exceed: (a) 52,000 pounds for vehicles up to thirty (30) feet long; or (b) 86,000 pounds for vehicles thirty (30) feet or more in length. Vehicles in excess of the above weights may be accepted for travel only if the customer complies with all conditions as may be required by the Authority for such travel.

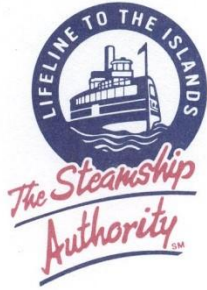
All travel on Steamship Authority ferries and use of its facilities are subject to these policies as well as the Steamship Authority's other published tariffs, policies and regulations, including its Customer Policy Handbook and its Rules and Regulations Governing Public Conduct on Terminal Property, both of which are posted on the SSA's website. If you choose to travel with us and/or use our facilities, you will be agreeing to abide by all of the terms and conditions of these policies.

We thank you for all of your assistance and cooperation in respecting our neighbors in all of our port communities by reducing the amount of noise generated by your trucks as much as possible. We also thank you for your continued business with the Steamship Authority. If you have any questions or concerns, please feel free to contact me at (508) 548-5011, ext. 219, or any of our Terminal Managers.

Sincerely,



Alison Fletcher
Director of Shoreside Operations



Woods Hole, Martha's Vineyard and Nantucket Steamship Authority

October 25, 2021

Dear Valued Freight Carrier:

Thank you for your continued patronage onboard the Steamship Authority's ferries. Please take this opportunity to once again review our terminal traffic and noise mitigation policies with your truck drivers. The Steamship Authority will be strictly enforcing those policies, and you will forfeit your reservations if any of your drivers intentionally or repeatedly violate them. These policies include restrictions (described below) on how early trucks can arrive at the Woods Hole terminal in the morning.

- Truck drivers are prohibited from idling their trucks' engines at any of our ferry terminals for more than five minutes in violation of chapter 90, section 16A, of the Massachusetts General Laws.
- Trucks are not to be backed up on terminal property except when necessary to stage them for boarding or to load them onto a ferry, with the permission of the Terminal Agent. In addition, when trucks are being backed up on terminal property, their back-up alarms may not be excessively loud, and should be adjusted to the extent possible so that they are only loud enough for their intended safety purposes.
- When driving to or from any of our ferry terminals, truck drivers are required to obey all posted speed limits and all other traffic laws, signs and restrictions, including stopping when required at all pedestrian and bicycle crossings. Truck drivers also should drive at all times in a safe and courteous manner towards other drivers, bicyclists, and residents of our surrounding communities.
- When driving on Woods Hole Road, drivers should reduce their speed well in advance of curves and downhill stretches so that they can minimize using their engine compression brakes (Jake brakes).
- Truck drivers may not stop or park alongside highways or roads where it is illegal to do so, such as alongside Woods Hole Road.
- Trucks when coming onto Steamship property should not cross the double yellow line until safely on Steamship property. This is best noted by the entrance to the employee parking lot.

In the future, freight carriers will not be allowed to make reservations for early-morning trips to or from Woods Hole for any truck that has a record of excessive noise on Woods Hole Road, whether the noise is due to the driver's use of the truck's engine compression brakes or due to the truck's age and/or lack of proper maintenance.

During the 2021 Winter Operating Schedules from October 19, 2021 to January 4, 2022, trucks (whether traveling with reservations or on standby) are **prohibited** from arriving at the Woods Hole terminal prior to **6:30 a.m.**, except as follows:

- Trucks with reservations for the 6:00 a.m. trip may arrive beginning at **5:30 a.m.**
- Trucks with reservations for the 6:30 a.m. and trips may arrive at the terminal beginning at **6:00 a.m.**

As a result, trucks with reservations for the 7:00 a.m. trip may **not** arrive at the terminal prior to 6:30 a.m.

Trucks that arrive at the Woods Hole terminal earlier than the above times will not be allowed to travel on standby that day and/or may forfeit their reservations. In addition, unless specifically approved by a Truck Coordinator in the Steamship Authority's Mashpee Reservations Office (for vehicles with reservations) or the Terminal Agent at the departure terminal (for vehicles traveling without reservations), the weight of vehicles traveling on the Steamship Authority's vessels may not exceed: (a) 52,000 pounds for vehicles up to thirty (30) feet long; or (b) 86,000 pounds for vehicles thirty (30) feet or more in length. Vehicles in excess of the above weights may be accepted for travel only if the customer complies with all conditions as may be required by the Authority for such travel.

All travel on Steamship Authority ferries and use of its facilities are subject to these policies as well as the Steamship Authority's other published tariffs, policies and regulations, including its Customer Policy Handbook and its Rules and Regulations Governing Public Conduct on Terminal Property, both of which are posted on the SSA's website. If you choose to travel with us and/or use our facilities, you will be agreeing to abide by all of the terms and conditions of these policies.

We thank you for all of your assistance and cooperation in respecting our neighbors in all of our port communities by reducing the amount of noise generated by your trucks as much as possible. We also thank you for your continued business with the Steamship Authority. If you have any questions or concerns, please feel free to contact me at (508) 548-5011, ext. 219, or any of our Terminal Managers.

Sincerely,



Alison Fletcher
Director of Shoreside Operations



Woods Hole, Martha's Vineyard and Nantucket Steamship Authority

September 10, 2021

Dear Valued Freight Carrier:

Thank you for your continued patronage onboard the Steamship Authority's ferries. Please take this opportunity to once again review our terminal traffic and noise mitigation policies with your truck drivers. The Steamship Authority will be strictly enforcing those policies, and you will forfeit your reservations if any of your drivers intentionally or repeatedly violate them. These policies include restrictions (described below) on how early trucks can arrive at the Woods Hole terminal in the morning.

- Truck drivers are prohibited from idling their trucks' engines at any of our ferry terminals for more than five minutes in violation of chapter 90, section 16A, of the Massachusetts General Laws.
- Trucks are not to be backed up on terminal property except when necessary to stage them for boarding or to load them onto a ferry, with the permission of the Terminal Agent. In addition, when trucks are being backed up on terminal property, their back-up alarms may not be excessively loud, and should be adjusted to the extent possible so that they are only loud enough for their intended safety purposes.
- When driving to or from any of our ferry terminals, truck drivers are required to obey all posted speed limits and all other traffic laws, signs and restrictions, including stopping when required at all pedestrian and bicycle crossings. Truck drivers also should drive at all times in a safe and courteous manner towards other drivers, bicyclists, and residents of our surrounding communities.
- When driving on Woods Hole Road, drivers should reduce their speed well in advance of curves and downhill stretches so that they can minimize using their engine compression brakes (Jake brakes).
- Truck drivers may not stop or park alongside highways or roads where it is illegal to do so, such as alongside Woods Hole Road.
- When arriving at the Woods Hole terminal, trucks should not cross into the oncoming lane of traffic to get around a line of vehicles waiting to check in, even if the line of vehicles extends as far as the Crane Street bridge or beyond.

In the future, freight carriers will not be allowed to make reservations for early-morning trips to or from Woods Hole for any truck that has a record of excessive noise on Woods Hole Road, whether the noise is due to the driver's use of the truck's engine compression brakes or due to the truck's age and/or lack of proper maintenance.

During the 2021 Late Summer Operating Schedules from September 10th to October 18th, trucks (whether traveling with reservations or on standby) are **prohibited** from arriving at the Woods Hole terminal prior to **6:30 a.m.**, except as follows:

- Trucks with reservations for the 5:30 a.m. trip may arrive beginning at **5:10 a.m.**
- Trucks with reservations for the 6:00 a.m. trip may arrive beginning at **5:30 a.m.**
- Trucks with reservations for the 6:30 a.m. and trips may arrive at the terminal beginning at **6:00 a.m.**
- Trucks with reservations for the 7:00 a.m. trip may arrive at the terminal beginning at **6:30 a.m.**

Trucks that arrive at the Woods Hole terminal earlier than the above times will not be allowed to travel on standby that day and/or may forfeit their reservations.

In addition, unless specifically approved by a Truck Coordinator in the Steamship Authority's Mashpee Reservations Office (for vehicles with reservations) or the Terminal Agent at the departure terminal (for vehicles traveling without reservations), the weight of vehicles traveling on the Steamship Authority's vessels may not exceed: (a) 52,000 pounds for vehicles up to thirty (30) feet long; or (b) 86,000 pounds for vehicles thirty (30) feet or more in length. Vehicles in excess of the above weights may be accepted for travel only if the customer complies with all conditions as may be required by the Authority for such travel.

All travel on Steamship Authority ferries and use of its facilities are subject to these policies as well as the Steamship Authority's other published tariffs, policies and regulations, including its Customer Policy Handbook and its Rules and Regulations Governing Public Conduct on Terminal Property, both of which are posted on the SSA's website. If you choose to travel with us and/or use our facilities, you will be agreeing to abide by all of the terms and conditions of these policies.

We thank you for all of your assistance and cooperation in respecting our neighbors in all of our port communities by reducing the amount of noise generated by your trucks as much as possible. We also thank you for your continued business with the Steamship Authority. If you have any questions or concerns, please feel free to contact me at (508) 548-5011, ext. 219, or any of our Terminal Managers.

Sincerely,



Alison Fletcher
Director of Shoreside Operations



Woods Hole, Martha's Vineyard and Nantucket Steamship Authority

July 27, 2021

Dear Valued Freight Carrier:

Thank you for your continued patronage onboard the Steamship Authority's ferries. Please take this opportunity to once again review our terminal traffic and noise mitigation policies with your truck drivers. The Steamship Authority will be strictly enforcing those policies, and you will forfeit your reservations if any of your drivers intentionally or repeatedly violate them. These policies include restrictions (described below) on how early trucks can arrive at the Woods Hole terminal in the morning.

- Truck drivers are prohibited from idling their trucks' engines at any of our ferry terminals for more than five minutes in violation of chapter 90, section 16A, of the Massachusetts General Laws.
- Trucks are not to be backed up on terminal property except when necessary to stage them for boarding or to load them onto a ferry, with the permission of the Terminal Agent. In addition, when trucks are being backed up on terminal property, their back-up alarms may not be excessively loud, and should be adjusted to the extent possible so that they are only loud enough for their intended safety purposes.
- When driving to or from any of our ferry terminals, truck drivers are required to obey all posted speed limits and all other traffic laws, signs and restrictions, including stopping when required at all pedestrian and bicycle crossings. Truck drivers also should drive at all times in a safe and courteous manner towards other drivers, bicyclists, and residents of our surrounding communities.
- When driving on Woods Hole Road, drivers should reduce their speed well in advance of curves and downhill stretches so that they can minimize using their engine compression brakes (Jake brakes).
- Truck drivers may not stop or park alongside highways or roads where it is illegal to do so, such as alongside Woods Hole Road.

In the future, freight carriers will not be allowed to make reservations for early-morning trips to or from Woods Hole for any truck that has a record of excessive noise on Woods Hole Road, whether the noise is due to the driver's use of the truck's engine compression brakes or due to the truck's age and/or lack of proper maintenance.

During the 2021 Summer Operating Schedules from June 24, 2021, trucks through September 9, 2021 (whether traveling with reservations or on standby) are **prohibited** from arriving at the Woods Hole terminal prior to **6:30 a.m.**, except as follows:

- Trucks with reservations for the 5:30 a.m. trip may arrive beginning at **5:10 a.m.**
- Trucks with reservations for the 6:00 a.m. trip may arrive beginning at **5:30 a.m.**
- Trucks with reservations for the 6:30 a.m. and 6:45 a.m. trips may arrive at the terminal beginning at **6:00 a.m.**
- Trucks with reservations for the 7:00 a.m. trip may arrive at the terminal beginning at **6:15 a.m.**

Trucks that arrive at the Woods Hole terminal earlier than the above times will not be allowed to travel on standby that day and/or may forfeit their reservations.

In addition, unless specifically approved by a Truck Coordinator in the Steamship Authority's Mashpee Reservations Office (for vehicles with reservations) or the Terminal Agent at the departure terminal (for vehicles traveling without reservations), the weight of vehicles traveling on the Steamship Authority's vessels may not exceed: (a) 52,000 pounds for vehicles up to thirty (30) feet long; or (b) 86,000 pounds for vehicles thirty (30) feet or more in length. Vehicles in excess of the above weights may be accepted for travel only if the customer complies with all conditions as may be required by the Authority for such travel.

All travel on Steamship Authority ferries and use of its facilities are subject to these policies as well as the Steamship Authority's other published tariffs, policies and regulations, including its Customer Policy Handbook and its Rules and Regulations Governing Public Conduct on Terminal Property, both of which are posted on the SSA's website. If you choose to travel with us and/or use our facilities, you will be agreeing to abide by all of the terms and conditions of these policies.

We thank you for all of your assistance and cooperation in respecting our neighbors in all of our port communities by reducing the amount of noise generated by your trucks as much as possible. We also thank you for your continued business with the Steamship Authority. If you have any questions or concerns, please feel free to contact me at (508) 548-5011, ext. 219, or any of our Terminal Managers.

Sincerely,



Alison Fletcher
Director of Shoreside Operations

APPENDIX F

Friday, August 19, 2022

4:30am - 6:30am

Time	Company Name	Truck Type
0508	[REDACTED]	Box
0508	[REDACTED]	Box
0509	[REDACTED]	Box
0510	[REDACTED]	Box
0510	[REDACTED]	Box
0510	[REDACTED]	Box
0511	[REDACTED]	Box
0511	[REDACTED]	Box
0512	[REDACTED]	Box
0512	[REDACTED]	Box
0513	[REDACTED]	Box
0515	[REDACTED]	Box
0518	[REDACTED]	Box
0526	[REDACTED]	Box
0531	[REDACTED]	Semi
0532	[REDACTED]	Semi
0535	[REDACTED]	Semi
0536	[REDACTED]	Box
0545	[REDACTED]	Semi
0546	[REDACTED]	Semi
0559	[REDACTED]	Tanker
0559	[REDACTED]	Box
0600	[REDACTED]	Tanker
0601	[REDACTED]	Tanker
0602	[REDACTED]	Tanker
0602	[REDACTED]	Tanker
0603	[REDACTED]	Semi
0603	[REDACTED]	Box
0603	[REDACTED]	Box
0605	[REDACTED]	Box
0606	[REDACTED]	Tanker
0606	[REDACTED]	Box
0612	[REDACTED]	Tanker
0619	[REDACTED]	Flat Bed

[illegible]

APPENDIX G



Woods Hole, Martha's Vineyard and Nantucket Steamship Authority

AUTHORITY MEMBERS

MOIRA E. TIERNEY
New Bedford Member, Chair

ROBERT F. RANNEY
Nantucket Member, Vice Chair

ROBERT R. JONES
Barnstable Member, Secretary

JAMES M. MALKIN
Dukes County Member

PETER J. JEFFREY
Falmouth Member

ROBERT B. DAVIS
General Manager

MARK K. ROZUM
Treasurer/Comptroller

TERENCE G. KENNEALLY
General Counsel

February 3, 2021

To: Authority Members
Port Council Members

From: Treasurer/Comptroller
Re: Embarkation Fees

Attached please find a summary of embarkation fees remitted by the Steamship Authority to the Commonwealth of Massachusetts Department of Revenue for 2021, totaling \$997,344.00. Since the port towns accepted the provisions of Chapter 46 of the Acts of 2003, as amended by Chapter 55 of the Acts of 2003, the Steamship Authority has remitted over \$16,820,675.50 in embarkation fees to the Massachusetts Department of Revenue. The embarkation fees recorded on this report are for Steamship Authority passenger traffic only. The private carriers are responsible for reporting directly to the Department of Revenue on a quarterly basis.

During 2021, the Steamship Authority reported a 36.6% increase in the total amount of fees collected overall versus the prior year. The Martha's Vineyard route saw an increase in the amount of fees collected of 35.2% while the Nantucket route saw an increase of 41.7%. The increase in fees is a direct result of the increase in passenger ridership compared to the prior year which was impacted due to the effects of Covid-19. Overall passenger traffic in 2021 was up 31.9% compared to the prior year. The Martha's Vineyard route was up 30.1% and the Nantucket route was up 40.2%.

Please feel free to contact me should you require any additional information in this regard.

Mark K. Rozum
Treasurer/Comptroller

2021 EMBARKATION FEES

JANUARY - DECEMBER

	Town					
	Barnstable	Falmouth	Nantucket	Oak Bluffs	Tisbury	Total
Total Passenger Trips	266,740	1,110,244	265,104	258,628	826,840	2,727,556
Exempt Commuter & Excursion Trips	29,280	326,309	32,190	26,682	295,419	709,880
Exempt Student Trips	4,045	8,598	1,919	2,302	6,124	22,988
Total Exempt Trips	33,325	334,907	34,109	28,984	301,543	732,868
Trips subject to Fee	233,415	775,337	230,995	229,644	525,297	1,994,688
Fee	0.50	0.50	0.50	0.50	0.50	
Fees Payable to Town	\$ 116,707.50	\$ 387,668.50	\$ 115,497.50	\$ 114,822.00	\$ 262,648.50	\$ 997,344.00

note: Barnstable fees are distributed 75% to Town of Barnstable, 25% to Town of Yarmouth

EMBARKATION FEES SUMMARY 2004 - 2021

	Town					
	Barnstable	Falmouth	Nantucket	Oak Bluffs	Tisbury	Total
2004	\$ 105,341.50	\$ 356,929.50	\$ 103,333.00	\$ 83,248.50	\$ 267,702.00	\$ 916,554.50
2005	107,916.50	351,298.00	104,344.50	80,251.50	265,429.50	909,240.00
2006	107,054.50	349,838.00	104,278.50	102,566.50	242,282.50	906,020.00
2007	110,553.50	351,810.50	108,794.50	106,096.50	239,637.50	916,892.50
2008	99,299.00	346,057.50	99,652.50	99,548.00	242,022.50	886,579.50
2009	97,670.50	347,333.00	97,326.00	99,186.50	243,279.50	884,795.50
2010	99,032.50	354,749.00	99,231.50	105,456.50	244,229.00	902,698.50
2011	98,219.00	345,798.00	98,269.50	101,089.50	239,808.50	883,184.50
2012	106,132.50	355,636.00	106,025.00	107,910.00	242,297.50	918,001.00
2013	110,499.00	354,016.00	110,171.50	104,762.00	243,734.00	923,182.50
2014	114,042.00	355,003.00	113,912.50	104,411.00	246,010.50	933,379.00
2015	122,593.50	373,023.50	122,752.00	112,352.00	255,364.50	986,085.50
2016	121,731.00	387,506.50	122,167.50	124,354.50	259,936.50	1,015,696.00
2017	108,543.00	389,542.50	107,075.50	131,818.00	254,616.50	991,595.50
2018	127,951.00	397,712.50	130,421.00	141,880.00	253,461.50	1,051,426.00
2019	125,659.50	410,717.00	124,448.50	145,361.00	261,793.00	1,067,979.00
2020	82,788.00	285,975.00	81,130.00	49,248.00	230,881.00	730,022.00
2021	116,707.50	387,668.50	115,497.50	114,822.00	262,648.50	997,344.00
Total Fees Payable to Towns	\$ 1,961,734.00	\$ 6,500,614.00	\$ 1,948,831.00	\$ 1,914,362.00	\$ 4,495,134.50	\$ 16,820,675.50

note: Barnstable fees are distributed 75% to Town of Barnstable, 25% to Town of Yarmouth

APPENDIX H

Exploring Short-Sea Shipping as an Alternative to Non-Bulk Freight Trucking in Southeastern MA



(Image: Freight Trucks and Cars on Ferry)

September 2021

Prepared by the Urban Harbors Institute and Flagship Management on behalf of the
Massachusetts Department of Transportation

Technical Report Document Page

1. Report No.	2. Government Accession No.	3. Recipient's Catalog No.	
4. Title and Subtitle Exploring Short-Sea Shipping as an Alternative to Non-Bulk Freight Trucking in Southeastern MA		5. Report Date September 2021	
		6. Performing Organization Code	
7. Author(s) Johnson, C., Novelly, A., Starbuck, K., Wiggin, J., Uiterwyk, K.		8. Performing Organization Report No.	
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		14. Sponsoring Agency Code n/a	
15. Supplementary Notes			
16. Abstract The Island of Martha's Vineyard relies on the transport of goods and people via Steamship Authority Vessels operating from Woods Hole in Falmouth, MA. The purpose of this research project was to study the feasibility of expanding the waterborne distribution of non-bulk freight between mainland Massachusetts and the island of Martha's Vineyard. The study focused on understanding the congestion and emissions impacts resulting from any change in port(s) of origin. Based on an analysis of information gathered from the Steamship Authority, interviews, document reviews, and the MOVES tool, this study concluded that (1) the Port of New Bedford is best suited, based on location and existing infrastructure, to serve as an additional port for freight ferry service--though upgrades to existing infrastructure would be required, (2) impacts to traffic volume resulting from transporting some percentage of freight through an off-Cape port would be minimal, and (3) operating a freight ferry roughly three trips/day from New Bedford would increase emissions as compared to the current scenario of all non-bulk freight passing through Woods Hole. The emissions calculations are being explored as part of supplementary study based on emissions data not generated by the MOVES tool.			
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Exploring Short-Sea Shipping as an Alternative to Non-Bulk Freight Trucking in Southeastern MA

Final Report

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September 2021

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Acknowledgements

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The Project Team would like to acknowledge the efforts of all who participated in interviews to develop this study, including staff and stakeholders from the towns of Falmouth, MA, New Bedford, MA, Wareham, MA, Somerset, MA, and Tisbury, MA; staff from Seastreak, the Steamship Authority, and R.M. Packer Company; and staff from the Massachusetts Department of Transportation who provided data and direction along the way.

Disclaimer

The contents of this report reflect the views of the author(s), who is responsible for the facts and the accuracy of the data presented herein. The contents do not necessarily reflect the official view or policies of the Massachusetts Department of Transportation or the Federal Highway Administration. This report does not constitute a standard, specification, or regulation.

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Executive Summary

This study of Exploring Short-Sea Shipping as an Alternative to Non-Bulk Freight Trucking in Southeastern MA was undertaken as part of the Massachusetts Department of Transportation (MassDOT) Research Program. This program is funded with Federal Highway Administration (FHWA) State Planning and Research (SPR) funds. Through this program, applied research is conducted on topics of importance to the Commonwealth of Massachusetts transportation agencies.

Research Need

The purpose of this research project was to examine the potential effects on highway congestion and total emissions from trucks and ferries carrying non-bulk freight to Martha's Vineyard, of a shift in the port of departure/return from Woods Hole, MA to an alternative Massachusetts port. The objective of such a shift being to remove freight trucks from roadways leading to and on Cape Cod by utilizing waterborne transportation for a greater portion of the trip. This is consistent with the interest of the nation and the Commonwealth to better incorporate navigable waterways into the freight transportation system when a waterborne mode (short sea shipping) reduces roadway congestion and proves more efficient and environmentally beneficial.

Goals/Objectives

- Understand current waterborne freight practices and condition and capacity of the ports in southeastern Massachusetts.
- Analyze the potential to shift some amount of non-bulk freight to an alternative mainland port to reduce the impacts of freight trucks on roadway congestion and air quality.
- Characterize and quantify the effects of this potential shift on traffic congestion and emissions.

Methodology

The project consisted of three tasks:

1. Assess the practical alternative Massachusetts ports to handle additional freight traffic. For each port this entailed an assessment of the capacity and condition of land- and water-side infrastructure, road access, navigability of the waterways, current maritime operations, public policies, long-range plans, and planned investments in facilities.
2. Assess the divertible freight truck traffic by reviewing data and information from past studies, MassDOT's Transportation Data Management System, and the Woods Hole, Martha's Vineyard and Nantucket Steamship Authority.
3. Quantify the potential difference in roadway congestion and truck and vessel emissions between the existing condition of moving non-bulk freight through Woods Hole and a shift to moving at least some of this freight through an alternative mainland port.

Review of current non-bulk freight shipping to Martha's Vineyard and assessment of alternative mainland ports

In accordance with the Enabling Act of the Woods Hole, Martha's Vineyard and Nantucket Steamship Authority (the Steamship Authority), the shipment of all non-bulk freight between mainland Massachusetts and the islands of Martha's Vineyard and Nantucket is conducted, licensed, or permitted by the Steamship Authority. Currently, virtually all non-bulk freight is carried on Steamship Authority vessels operating between Woods Hole on the mainland and Vineyard Haven and Oak Bluffs on the island. The freight is carried both on freight vessels (with some limited passenger capacity) and on the Authority's passenger and vehicle ferries (Table 1).

Table 1: Steamship Authority Vessels Used to Transport Freight

Vessel Name	Primary Use(s)
M/V Eagle	Freight and Passenger
M/V Gay Head	Freight
M/V Governor	Freight
M/V Island Home	Passenger, vehicle, and freight
M/V Katama	Freight
M/V Martha's Vineyard	Passengers and vehicles
M/V Nantucket	Passengers and vehicles
M/V Sankaty	Freight
M/V Woods Hole	Passenger, vehicle, and freight

Data for calendar year 2019 was used to characterize current conditions, as that is the most recent year with complete data unaffected by the COVID-19 pandemic. In that year the Steamship Authority carried 53,366 freight trucks on one-way trips between Woods Hole and Martha's Vineyard.

Using the Steamship Authority's Occupied Vessel Capacity Report for 2019 and the Authority's definition of freight trucks as those occupying two to five spaces on their vessels plus mail trucks, Table 2 illustrates the monthly distribution of freight trucks carried on Steamship Authority vessels between Woods Hole and Martha's Vineyard.

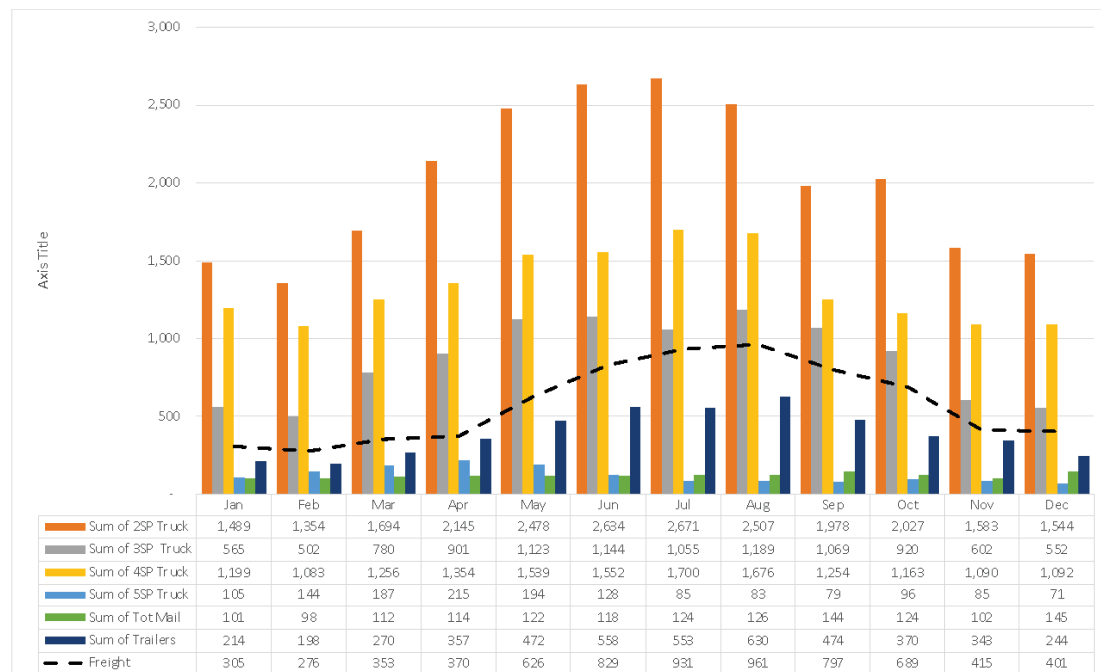


Figure 1: Distribution of freight trucks carried on Steamship Authority vessels between Woods Hole and Martha's Vineyard in 2019. Dashed line indicates amount carried on freight vessels. Note: chart includes trailers, but their numbers are not included in freight truck totals.

These 53,366 freight trucks travel roadways leading to or from Woods Hole. As for the origins of trucks carrying freight to Martha's Vineyard, we relied on data compiled by a project team member for an earlier study. Almost 40 percent of freight trucks going to or from the ferry terminal in Woods Hole pass through New Bedford coming from the west or northwest. A nearly equal percentage passes through Wareham coming from points north. A smaller percentage (22 percent) of freight originates on Martha's Vineyard and Cape Cod.

Alternative mainland ports

Information was compiled on existing conditions and potential capacity for additional freight shipping for a number of ports and harbors along the Southeastern coast of Massachusetts: New Bedford, Fairhaven, Fall River, Somerset, and Wareham. Information was drawn from statewide studies of ports and harbors, national databases, and studies, reports and plans prepared for individual ports. Information was collected on landside access (roadways), port infrastructure, current port operations and activities, navigability of the harbor and approach channels, and over-water distance to Martha's Vineyard. Additionally, the community's interest in serving as terminal for non-bulk freight shipping to Martha's Vineyard was discerned through review of policy documents and interviews with officials. Detailed port profiles and data sources are presented in the Task 1 deliverable.

While each port had notable qualities, New Bedford was determined to be most advantageous based on its relative proximity to Martha's Vineyard and overall physical assets. The Port of New Bedford has ready access from the Interstate highway (I-195), considerable waterfront infrastructure including terminal locations suitable for non-bulk freight shipping, adequate harbor and channel depths, and an active maritime economy. Most importantly, New Bedford is the closest port (of those studied) to Martha's Vineyard in terms of nautical miles and time

underway. This conclusion does not suggest or assume political support or the availability of funding that may be needed to enable the service.

Assessment of current traffic volumes and congestion and the divertible freight truck traffic

Traffic volume was examined in the context of (1) highway access to the Cape over the Bourne and Sagamore bridges, and (2) local Falmouth roadways.

Data from MassDOT's Transportation Data Management System was used to characterize traffic volume on the roadways leading to Cape Cod and Woods Hole. Using Annual Average Daily Traffic (AADT) for the Sagamore Bridge and the Bourne Bridge, approximately 38,668,465 vehicles passed over the Bourne and Sagamore Bridges (combined) in 2019. If all of the 53,366 freight trucks going to or coming from Woods Hole go over one of these two bridges, these trucks represent 0.138 percent of total bridge traffic.

In terms of congestion on the bridges, the Cape Cod Commission uses the following volume to capacity ratios to determine a roadway's congestion. Based on Cape Cod Commission analyses, most traffic monitoring in the vicinity of the bridges shows a failing congestion grade during summer months (Table 2).

Table 2: Volume to capacity ratios used to determine levels of congestion

Symbol	V/C Ratio Threshold	Level of Service (LOS)
●	0.8	C or Better
●	0.9	D
●	1.0	E
●	>1.0	F

For the main roads leading to Woods Hole, the Average Annual Daily Traffic (AADT) on Route 28 south of Brick Kiln Road going both north and south was 21,089 vehicles in 2019. In 2018 AADT on Woods Hole Road (south of Oyster Pond Road) was 7,966.

If it can be assumed that all freight trucks travelling to and from the Steamship Authority terminal in Woods Hole during 2019 passed each of these two points, then:

- Trucks travelling on the Steamship Authority ferries made up 0.693% of those vehicles on Route 28 south of Brick Kiln Road.
- Trucks travelling on the Steamship Authority ferries made up 1.84% of those vehicles on Woods Hole Road (south of Oyster Pond Road).

The roadways leading to the Woods Hole ferry terminal receive a congestion grade of C or better in the analyses performed by the Cape Cod Commission.

Though freight trucks are a very small percent of total traffic on Falmouth roadways, community members in Falmouth have long expressed concerns about noise, safety, congestion, and degradation of community character associated with freight trucks travelling the local roadways. The Steamship Authority has worked to reduce noise and safety concerns through size limits to trucks departing on the 5:30 A.M. vessel, but community members continue to seek additional measures to reduce the disruptions caused by freight trucks servicing the Island.

While freight trucks are a small portion of the Cape's total traffic, the efficiency of freight shipment via truck is impacted by general congestion on roadways leading to and on Cape Cod. Increased and unpredictable travel times due to roadway congestion may influence shipping companies' decision to see the advantage of operating from a port off Cape.

Analysis of truck and vessel emissions associated with shipping of non-bulk freight to Martha's Vineyard

Emissions were calculated for trucks and vessels carrying non-bulk freight between Tisbury, MA and Woods Hole in Falmouth, MA in 2019 (the most recent year with complete data unaffected by the COVID-19 pandemic). For comparison, we modelled emissions generated by trucking a portion of this freight to and from the State Pier in New Bedford and then shipping it to the terminal in Vineyard Haven. The methodologies for these calculations are described below.

To conduct our analysis, we:

1. Identified the emissions associated with a single one-way vessel trip for (1) a vessel travelling between Woods Hole and Vineyard Haven, and (2) a vessel travelling between New Bedford and Vineyard Haven, based on engine tier.
2. Identified the emissions for a single one-way combination or single-unit truck trip, using intercept points to estimate mileage and using emissions data from the Federal Highway Administration.
3. Modeled the emissions of both vessels and trucks based on:
 - a. "Existing Conditions" emissions, using 2019 numbers, for the number of freight trucks and vessels that transported freight between Woods Hole and Martha's Vineyard, and
 - b. "Scenario Condition" emissions, using 2019 numbers, for the number of freight trucks that would be transported on roughly three round-trip vessel passages per day, as well as related vessel emissions for those passages.
4. Compared the emissions from the "existing conditions" and "scenario conditions" calculations

Understanding the caveats listed below, results indicate that when considering the combined vessel and truck emissions produced in the shipment of non-bulk freight between Martha's Vineyard and mainland Massachusetts in 2019, the modelled shipment of all freight through Woods Hole generated nearly 80% as much NO_x and CO₂ as was emitted under scenario conditions.

Several important caveats are needed to accurately interpret the results of this analysis:

1. Origin and destination points for freight trucks were not available, therefore truck routes were categorized based on likely intercept points, and emissions calculations were estimated from those intercept points.
2. Freight trucks are carried on a variety of Steamship Authority vessels, including those not dedicated to freight. However, for purposes of this analysis, all trucks were transported via a standard 220-foot supply vessel with an average capacity of 16 trucks, allowing emissions to be compared across existing and scenario conditions.
3. Emissions calculations were based on current shipping practices, and do not take into consideration such things as strategies to reduce the overall number of freight trucks (*e.g.*, through freight consolidation) or emissions related to different types of vessels.

4. The City of New Bedford has not expressed to the report's authors a specific interest in a freight ferry service. Therefore, while the New Bedford State Pier was used in the scenario presented, this does not mean that the City has endorsed a freight ferry service.

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Exploring Short-Sea Shipping as an Alternative to Non-Bulk Freight Trucking in Southeastern MA

Task 1 Deliverable
December 2020

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This chapter presents an overview of current non-bulk freight shipping activities between the mainland and Martha's Vineyard. The chapter includes an overview of current conditions as well as descriptions of existing freight volumes and near future capacity for non-bulk freight in New Bedford/Fairhaven, Fall River, Somerset, Falmouth (Woods Hole), Oak Bluffs, and Tisbury (Vineyard Haven), Massachusetts.

OVERVIEW OF SHORT SEA SHIPPING IN SOUTHEASTERN MASSACHUSETTS

In accordance with the Enabling Act of the Woods Hole, Martha's Vineyard and Nantucket Steamship Authority (the Steamship Authority), the shipment of all non-bulk freight between mainland Massachusetts and the islands of Martha's Vineyard and Nantucket is conducted, licensed, or permitted by the Steamship Authority:

*Except as provided in this act, no person shall operate a vessel for the carriage of vehicles or freight for hire or resale by water between the mainland and the island of Martha's Vineyard or the island of Nantucket or between said islands unless licensed or permitted in writing to do so by the Authority.*¹

The Enabling Act, which is limited to freight shipment in Massachusetts, does provide exceptions to the Steamship Authority's purview related to services provided or contracted before May 30, 1973 or the operations of existing service from the port of New Bedford to the island of Martha's Vineyard by the motor vessel *Manisee* or a replacement vessel. As of the writing of this report, those exceptions are not in place.

Existing Steamship Authority Operations

Currently, the Steamship Authority provides non-bulk freight shipping on both vessels dedicated to freight shipment as well as its passenger and car ferries. Some of the most common types of freight brought to Martha's Vineyard include mail, express packages, fuel, food (38% of all truck trips), and building material (17% of all truck trips), while waste and recyclables are shipped off-island (13% of all truck trips).² Their freight shipment schedules vary based on the season and destination. For example, during the summer months of 2020 (June 17, 2020 through September 8, 2020), the Steamship Authority's schedule included round-trip freight trips to Vineyard Haven seven times a day Sunday-Saturday between the hours of 6:15 AM and 8:30 PM. They offered an additional three round-trip freight trips per day Monday-Friday. During the late fall/early-winter (October 21, 2020-January 2, 2021) they scheduled six daily round-trip freight trips between Woods Hole and Vineyard Haven, and two additional trips on Fridays and Sundays.

During the late-winter months (January 4, 2020-March 15, 2020), the Steamship Authority offered two round-trip freight trips to Nantucket Monday-Saturday, and an additional round-trip freight trip Monday-Friday. During the summer months (June 17, 2020 –September 8, 2020), they offered three round-trip freight trips each day. During the spring (April and May) the Steamship Authority offers between three and five round-trip freight trips per day.

Currently, the Steamship Authority uses the following vessels to transport freight to and from the islands:³

¹ Enabling Act of the Woods Hole, Martha's Vineyard and Nantucket Steamship Authority, St. 1960, c. 701, § 5.

² Martha's Vineyard Commission. 2015. Martha's Vineyard Transportation Plan—Draft 2015. Online at: https://www.mvcommission.org/sites/default/files/docs/Draft%20MVTP%202015_0.pdf.

³ The Steamship Authority. Vessels. Online at: <https://www.steamshipauthority.com/about/vessels>.

Table 2: Steamship Authority Vessels Used to Transport Freight

Vessel Name	Entered service with the Steamship Authority*	Primary Use(s)
<i>M/V Eagle</i>	1987	Freight and Passenger
<i>M/V Gay Head</i>	1989	Freight
<i>M/V Governor</i>	1989 (built in 1954)	Freight
<i>M/V Island Home</i>	2007	Passenger, vehicle, and freight
<i>M/V Katama</i>	1988	Freight
<i>M/V Martha's Vineyard</i>	1993	Passengers and vehicles
<i>M/V Nantucket</i>	1974	Passengers and vehicles
<i>M/V Sankaty</i>	1994	Freight
<i>M/V Woods Hole</i>	2016	Passenger, vehicle, and freight

*Note that some vessels may have provided service elsewhere prior to joining the Steamship Authority's fleet.

Some of these vessels can accommodate trucks up to 70 feet long and much of the freight is transported by Cape Cod Express, Carroll's Trucking, Sun Transportation, FedEx, UPS, Hallsmith-SYSCO, and Sid Wainer & Sons.⁴ In some cases, freight is brought to the islands on large trailers (50-70 feet long and 80,000lbs. loaded) and transferred onto smaller trucks (25-35 feet) for delivery.⁵ Gasoline and propane are brought to Martha's Vineyard in trucks on Steamship Authority's ferries. Barges also deliver gasoline, kerosene, diesel, and heating fuel oil to R.M. Packer's Shell oil terminal.⁶

Given the restrictions on shipment of non-bulk freight, current operations are limited to the following routes:

- Hyannis to Nantucket terminal (1 Steamboat Wharf, Nantucket, MA), operated by the Steamship Authority
- Woods Hole to Oak Bluffs terminal (1 Seaview Avenue, Oak Bluffs, MA), operated by the Steamship Authority
- Woods Hole to Vineyard Haven terminal (1 Water Street, Vineyard Haven, MA), operated by the Steamship Authority

Hy-Line Cruises, which provides vessel service between Cape Cod and the islands, provides passenger service only and any freight transported by their vessels is limited to that which can fit on a hand dolly, such as furniture, boxes, kayaks, building material, and commercial items.⁷

⁴ Martha's Vineyard Commission. 2015. Martha's Vineyard Transportation Plan – Draft June 2015. Online at: https://www.mvcommission.org/sites/default/files/docs/Draft%20MVTP%202015_0.pdf.

⁵ Martha's Vineyard Commission. 2015. Martha's Vineyard Transportation Plan – Draft June 2015. Online at: https://www.mvcommission.org/sites/default/files/docs/Draft%20MVTP%202015_0.pdf.

⁶ Martha's Vineyard Commission. 2015. Martha's Vineyard Transportation Plan – Draft June 2015. Online at: https://www.mvcommission.org/sites/default/files/docs/Draft%20MVTP%202015_0.pdf.

⁷ Hy-Line Cruises Freight Policy. Available online: <https://hylinecruises.com/freight/>.

Patriot Party Boats also provides service between Cape Cod and Martha's Vineyard, travelling between Oak Bluffs and Falmouth. These vessels are not licensed by the Steamship Authority due to their small size, but they do conduct some freight shipments such as auto parts and building supplies.⁸

Volumes of non-bulk freight to each port are not publicly available, but the Steamship Authority does provide information about the number of trucks that travel from the mainland to the islands. The number of trucks travelling between the mainland and the islands is usually at its highest in May, June, and July and at its lowest in January and February. It is worth noting that the tables below include commercial and non-commercial trucks and that some of the trucks making these trips are not full or are only partially full, thus there is no clear volume of freight to be concluded from these numbers.

Table 3: Trucks Carried to and from Martha's Vineyard (2010-2020)

Trucks Carried to and from Martha's Vineyard													
Traffic Statistics represent one-way totals. A round trip passage is counted as two. Includes non commercial trucks.													
	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Totals
2010	7,591	7,183	9,602	10,510	11,516	11,759	10,632	9,965	10,178	9,733	8,832	8,960	116,461
2011	7,439	7,227	9,439	9,967	11,272	11,679	10,631	10,256	9,893	9,798	8,747	8,434	114,782
2012	7,322	7,460	9,150	9,887	11,505	11,106	10,480	10,271	9,457	9,143	8,854	8,323	112,958
2013	7,739	6,857	9,020	10,562	12,281	11,669	11,461	10,491	10,604	10,779	8,891	8,568	118,922
2014	7,620	7,588	9,115	11,011	12,170	12,084	11,419	10,091	11,144	11,067	8,936	9,135	121,380
2015	7,290	6,862	9,594	11,326	12,590	12,516	11,841	10,511	11,483	11,480	9,956	9,629	125,078
2016	8,441	8,107	10,921	11,795	12,988	13,157	11,773	11,202	11,582	11,343	10,482	9,794	131,585
2017	8,806	8,267	10,611	12,283	14,177	13,807	12,133	11,970	11,049	12,634	11,031	9,938	136,706
2018	8,783	8,845	8,811	11,925	14,037	13,801	12,718	12,453	12,183	12,522	11,065	10,492	137,635
2019	9,352	9,029	11,607	12,801	14,134	13,680	13,066	12,474	12,308	11,825	10,788	10,228	141,292
2020	9,588	9,496	8,873	5483	9,111	12,771							55,322

Source: Steamship Authority Business Summaries, 2019 (all months)

Table 4: Trucks Carried to and from Nantucket (2010-2020)

Trucks Carried to and from Nantucket													
Traffic Statistics represent one-way totals. A round trip passage is counted as two. Includes non commercial trucks.													
	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Totals
2010	2,500	2,393	2,991	3,587	4,040	4,342	4,098	3,743	3,312	3,288	3,021	2,860	40,175
2011	2,407	2,463	3,121	3,364	4,002	4,325	3,904	3,717	3,261	3,141	3,020	2,873	39,598
2012	2,557	2,601	3,297	3,632	4,314	4,268	3,922	3,694	3,195	3,312	3,170	2,837	40,799
2013	2,702	2,549	3,114	3,857	4,694	4,192	4,422	3,942	3,532	3,695	3,227	3,300	43,226
2014	2,793	2,635	3,178	4,122	4,942	4,466	4,505	3,972	3,834	3,942	3,344	3,464	45,197
2015	2,969	2,626	3,836	4,287	4,986	4,905	4,907	4,199	4,081	3,797	3,635	3,555	47,783
2016	2,978	3,072	4,074	4,522	5,213	4,948	4,740	4,738	4,317	4,101	4,113	3,698	50,514
2017	3,461	3,162	3,936	4,832	5,409	5,174	4,869	4,849	4,178	4,682	4,235	3,895	52,682
2018	3,255	3,553	3,592	4,922	5,714	5,057	4,944	4,827	4,533	4,672	4,023	3,830	52,922
2019	3,716	3,408	4,311	5,084	5,832	5,134	5,104	4,722	4,683	4,445	3,935	3,662	54,036
2020	3,570	3,448	3,468	2,060	3,967	4,829							21,342

Source: Steamship Authority Business Summaries, 2019 (all months)

Pilot Programs

In 2000, the Steamship Authority initiated a pilot program to transport freight between New Bedford and Martha's Vineyard. This was, reportedly, the result of a push by New Bedford for a share of ferry

⁸ Martha's Vineyard Commission. 2015. Martha's Vineyard Transportation Plan – Draft June 2015. Online at: https://www.mvcommission.org/sites/default/files/docs/Draft%20MVTP%202015_0.pdf.

service, a proposal that also found support among Falmouth residents. This also resulted in the inclusion of New Bedford as a voting member of the Steamship Authority.⁹

The Authority contracted with Hvide Marine Incorporated to operate a freight service between the New Bedford State Pier and the Steamship Authority's Vineyard Haven terminal that ran two times a day, five days a week from May 1, 2000 through October 31, 2000. The service was limited to trucks 20 feet and over to maximize the number of larger trucks that would not need to pass through Woods Hole. The service carried a total of 1,900 trucks (one-way) or an average of 14.5 trucks per day. The rate charged per truck was in parity with that charged on the Woods Hole to Martha's Vineyard route. Revenues covered only around 15 percent of the cost of the service.

In 2001, the Steamship Authority contracted with Hvide to provide the same service, except over a longer period, from April 2, 2001 through November 30, 2001. Trucks less than 20 feet in length were allowed during this pilot. A total of 3,030 trucks were carried on a one-way basis and revenue covered about 22 percent of cost.

The Steamship Authority's Board voted to have the Authority itself operate the service in 2002, but was unable to get permission from the City of New Bedford to use the State Pier, so the service never operated.

Additional Feasibility Studies

Ten years later, in 2012, Steamship Authority staff analyzed the financial feasibility of the Steamship Authority operating a freight service between New Bedford and Martha's Vineyard. The analysis adjusted the number of days, length of the vessel's operating day, and frequency of service, but ultimately concluded it was not feasible.

In 2015, the Falmouth and New Bedford members of the Steamship Authority Board again asked Steamship Authority staff to revisit the possibility, looking at all options and all resources, including:

- whether the freight service should be year-round or seasonal,
- whether it should be self-supporting,
- whether certain shippers or commodities should be required to use the service,
- what types of vehicles should be allowed to use the service, and
- what sources of funding might be available for the service.

If the Steamship Authority were to provide the service itself, these questions would also need answers:

- should the Steamship Authority decrease the number of truck spaces that are available on trips between Woods Hole and Martha's Vineyard, and
- should the Steamship Authority use its "spare" vessel to provide the service.

Or, if the Steamship Authority were to have a private operator provide the service, policy questions to be decided included:

- whether the Steamship Authority should work with only one operator or issue a request for proposals,

⁹ Steamship Authority, 2016. Preliminary Report on the Feasibility of Providing Freight Service between New Bedford and Martha's Vineyard. Online at: https://www.steamshipauthority.com/writable/versioned_downloadable_forms/path/new_bedford-marthas_vineyard_freight_service_report_-_2016-04-12.pdf

- whether the Steamship Authority should allow the private operator to use the Steamship Authority's facilities,
- whether the Steamship Authority should be responsible for the private operator's reservations and tickets,
- whether the Steamship Authority should determine what rates and fares the private operator can charge, and
- who should assume the financial risk of the service, the Steamship Authority or the private operator.

The Steamship Authority staff conducted an analysis of all variables and alternatives and, on April 12, 2016, issued a "Preliminary Report on the Feasibility of Providing Freight Service between New Bedford and Martha's Vineyard,"¹⁰ which recommended the following (subject to a public review and comment process):

- Steamship Authority entertain proposal from Packer Marine to provide barge and tug service to transport roll-on/roll-off freight from New Bedford to Martha's Vineyard
- engage Craig Johnson to determine if any private operators are interested in providing the service at their own financial risk under license from the Steamship Authority.
- join with regional and local officials to seek funding from the appropriate state agency(ies) to:
 - construct, operate and maintain a freight ferry terminal in New Bedford
 - offset the Steamship Authority's deficit for running a New Bedford to Martha's Vineyard service
- once above funding is secured, and if no private operator is interested in providing the service, the Steamship Authority lease/charter a vessel from a private operator and run the service as follows:¹¹
 1. two round trips per day on weekdays for 22 weeks during the summer
 2. Steamship Authority provides ticketing and reservation services integrated with their other routes so customers can choose to take different routes coming and going
 3. first trip of the day from New Bedford designated as a hazardous cargo trip. Unfilled spots would be available to other trucks and cars
 4. customers traveling between New Bedford and Martha's Vineyard with their vehicles (both trucks and automobiles) would be able to make reservations on that route the same way they are able to make reservations from Woods Hole
 5. on the Steamship Authority's other freight trips, auto customers are allowed to travel standby on all freight trips
 6. non-hazardous freight shippers are allowed to ship their trucks to Martha's Vineyard without drivers as long as they assure Steamship Authority that their driver will meet the vessel on Martha's Vineyard so the truck can be immediately driven off the vessel
 7. operate as a summer-seasonal service for an initial three-year period
 8. New Bedford route would have same fares as the Woods Hole route.

The public comment process that followed elicited a few comments.¹² New Bedford Mayor Mitchell confirmed the City is interested in developing freight opportunities, but that any proposal would need to be consistent with the March 2016 New Bedford Waterfront Framework Plan which reimagined the State Pier as, "a new center for the waterfront tourism experience." The plan did not accommodate a ferry

¹⁰ *Ibid.*

¹¹ These 8 points incorporate minor modifications made to the proposal by the Steamship Authority following receipt of public comments.

¹² Steamship Authority, 2017. Responses to the Public Comments Received Regarding the Preliminary Report on the Feasibility of Providing Freight Service between New Bedford and Martha's Vineyard. Online at: https://www.steamshipauthority.com/writable/versioned_downloadable_forms/path/responses_to_public_comments_-_2017-03-02.pdf.

service for vehicles or freight trucks and certain cargoes, such as municipal solid waste from the Islands, would be incompatible. There was interest in exploring possibilities of the South Terminal or Northern Waterfront District where, in September 2016, the City noted they were considering developing a multi-modal transportation facility in the Northern Waterfront.

Whether this location would be feasible for freight shippers largely depended on how much additional time would be needed to travel by boat from New Bedford to Martha's Vineyard. However, freight shippers who travel entirely by ferry between New Bedford and Martha's Vineyard will benefit from a reduction in their trucks' fuel and maintenance costs. The Steamship Authority did not believe that a shift in departure terminals would result in an increase in the cost of goods on the island that are shipped entirely by ferry from New Bedford.

The Steamship Authority also commissioned Craig Johnson of Flagship Management to explore whether any private operators might be interested in providing the New Bedford freight service at their own financial risk under a license agreement with the Steamship Authority and, if so, under what terms and conditions. Johnson's report, completed in August 2017, assessed three sites in New Bedford (State Pier, Marine Commerce Terminal, Shuster property); looked at companies that could supply an appropriate vessel (good fuel economy, 75-125 gal/hr., with large decks, at least 130 ft long x at least 40 ft wide); identified a handful of companies that could be interested in operating the service; and interviewed shippers that use the Woods Hole service. The shippers were largely supportive of the proposed service from New Bedford, particularly those shippers closer to and west of New Bedford. A few companies were against a service if it reduced the number of trips offered from Woods Hole to Martha's Vineyard. A few of the companies said they would use the service if they were able to drop a truck in New Bedford and pick it up on Martha's Vineyard as currently done on the Nantucket run (*i.e.*, driverless while on the vessel).

Based on Johnson's August 2017 report, the Steamship Authority issued "A Proposed Service Model for a Freight Service between New Bedford and Martha's Vineyard".¹³ The proposal included:

1. a private ferry operator providing the service (at its own financial risk) with no subsidy from the Steamship Authority, except for allowing the operator to use the Steamship Authority's reservation system and the Steamship Authority's Vineyard Haven terminal,¹⁴ and coordinating schedules to enable shippers to use both services
2. the New Bedford State Pier (now managed by MassDevelopment) as the New Bedford terminal. Steamship Authority would work with the City, MassDevelopment, other municipalities, and government agencies to obtain funding to repair the State Pier.
3. a private operator with whom the Steamship Authority would enter into a license agreement.
4. a service that would initially operate as follows:
 - a) private operator uses the Vineyard Haven terminal
 - b) two roundtrips per day on weekdays for 22 weeks during the summer with potential to operate on weekends. (Shippers generally ship on weekdays.)

¹³ Craig Johnson (Flagship Management). 2017. Initial Report on the Possibility of a Freight Ferry Service Between Martha's Vineyard and New Bedford. Online at: https://www.steamshipauthority.com/writable/versioned_downloadable_forms/path/flagship_management_initial_report_-_2017-08-10_copy1.pdf.

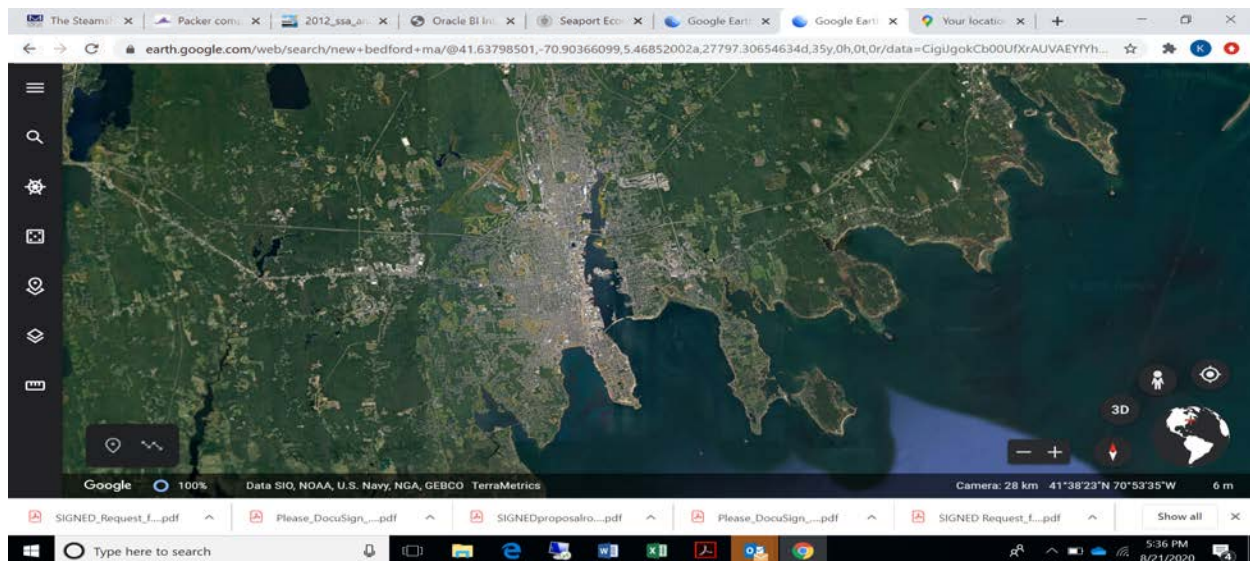
¹⁴ The only other feasible terminal is Packer Marine's facility on Beach Road in Vineyard Haven. Oak Bluffs's terminal is not suitable because wooden dockdocks cannot support trucks over 80,000 pounds. However, if New Bedford service was to start, some other SSA trips could be transferred to Oak Bluffs to reduce traffic and scheduling conflicts.

- c) Steamship Authority provides reservation and ticketing services, integrated with existing services
- d) nonhazardous shippers could ship trucks without drivers as long as truck is met by its driver when the vessel arrives in port
- e) first daily one-way trip from New Bedford tentatively designated as a "hazardous cargo" trip
- f) passengers and vehicles would be able to make reservations in the same way they can on the Steamship Authority's other freight services and also on a stand-by basis
- g) initial period of several years, with potential to extend.

HARBOR PROFILES

The following section provides profiles of the ports identified in the scope, including information about existing conditions and potential shipping activity. The ports covered in this section include New Bedford/Fairhaven, Fall River, Somerset, Falmouth (Woods Hole), Oak Bluffs, and Tisbury, Massachusetts.

NEW BEDFORD/FAIRHAVEN



The Port of New Bedford is a deep-water commercial port located in the New Bedford/Fairhaven Harbor on the south coast of Massachusetts. New Bedford has been a port city since the 18th century and its waterfront has supported a rich variety of maritime activities over its history. The Town of Fairhaven on the eastern shore of the harbor across from New Bedford also has a strong working waterfront with publicly- and privately-owned berthing facilities for the commercial fishing fleet, significant marine repair and recreational boat marina operations, shipyard, charter, and excursion boat services. While Fairhaven's maritime businesses may have a role in supporting a freight service from this harbor, New Bedford's landside and waterfront infrastructure is currently more suited to a freight operation. Portions of both the New Bedford and Fairhaven waterfronts are classified as Designated Port Areas (DPAs) by the Massachusetts Office of Coastal Zone Management, the purpose of which is to preserve and promote maritime industry. DPAs are subject to specific provisions, including land use restrictions under Massachusetts General Law Chapter 91, which encourage the creation or expansion of water-dependent industrial facilities, such as waterborne freight services, in developed harbor areas.

In recent years New Bedford is most widely recognized for commercial fishing—it is the highest grossing commercial fishing port in the United States with more than 500 commercial scallopers and fishermen at the center of an industry cluster that includes seafood processors and distributors, fueling companies, equipment manufacturers, and maritime services. In 2015, approximately 140 million pounds of seafood were landed in New Bedford Harbor and an additional 250 million pounds of domestic and international seafood was processed.¹⁵ In fact, the majority of the seafood processed in New Bedford arrives frozen and leaves frozen.

The New Bedford/Fairhaven Harbor is more than fishing, however. Its location, port infrastructure, and landside transportation assets support traditional maritime businesses including cargo shipping and handling, cruise ships, bulk and break-bulk cargo facilities, shipyard and vessel and rig repair and maintenance, passenger ferry operations, and recreational boating. More recently, bolstered by state and local policies and investment, the Harbor is positioned to become a center for the nascent U.S. offshore wind industry.

The Port supports a diverse market of cargo, and handles and transports more than \$230 million in bulk commodities and break-bulk cargo. In 2015, a total of 280,000 tons of cargo moved through the marine facilities owned by the Port of New Bedford, including petroleum, aggregates, and imported fruits. Not all of the infrastructure in the Harbor falls under the control of the New Bedford Port Authority.¹⁶ Most of the city's waterfront is privately-owned or leased, and the State owns two major facilities and has partial ownership of the Pope's Island Marina.

New Bedford/Fairhaven Harbor has a federal channel with an authorized depth of -30 feet and width of 350 feet. It has not been fully dredged by the Army Corps of Engineers in more than 50 years but, in 2015, the Commonwealth of Massachusetts completed an Interim Federal Channel Dredging Project, removing 117,000 cubic yards of material from the federal navigation channel inside and outside of the hurricane barrier. This project brought the channel depth to -28.5 feet MLLW which facilitates ships delivering cargo and equipment to multiple port facilities including the Marine Commerce Terminal, and the New Bedford State Pier.

Dredging has been a particular challenge in New Bedford Harbor since 1980 when the U.S. Environmental Protection Agency (EPA) determined the Harbor to be contaminated and a threat to public health from years of discharge from local manufacturers.¹⁷

The Harbor is protected by the New Bedford hurricane barrier which stretches across the water from the south end of New Bedford to the Town of Fairhaven. The barrier's 150-foot opening closes during hurricane conditions and coastal storms making it one of the safest harbors on the eastern seaboard.

Massachusetts Route 6 crosses the Harbor over the New Bedford-Fairhaven Bridge which consists of three bridge spans interspersed among two mid-harbor islands, Fish and Pope's Islands. The middle span is a swing bridge over the harbor's main shipping channel allowing vessels to pass through into the northern harbor area. The east and west spans are fixed. The bridge was completed in 1903 and is classified as functionally obsolete which limits the utilization of the deep-water port facilities in the north portion of inner harbor and the movement of local marine traffic. A project to replace the bridge is requested in the Southeastern Massachusetts MPO 2040 Long Range Transportation Plan.

¹⁵ Martin Associates and Apex Companies, LLC. 2016. Economic Impact Study of the New Bedford/Fairhaven Harbor. Prepared for The New Bedford Harbor Development Commission. Online at: <https://portofnewbedford.org/wp-content/uploads/2019/04/Full-2019-Martin-Report.pdf>

¹⁶ *Ibid.*

¹⁷ *Ibid.*

Existing Conditions Related to Shipping

The New Bedford Port Authority (NBPA, formerly the Harbor Development Commission) was created by the Massachusetts General Court under Chapter 762 of the Acts of 1957. It is an autonomous body charged with managing the Port including all City-owned waterfront property; its mission is to keep New Bedford on top as the number one U.S. fishing port, expand existing businesses, and capitalize on new opportunities to maximize the Port's potential as an economic engine to create jobs and strengthen the New Bedford economy.¹⁸

City-owned properties managed by the NBPA are utilized almost exclusively by the fishing industry:

- Homer's Wharf: houses some of the waterfront's seafood processing companies and provides berthing for commercial fishing vessels.
- Leonard's Wharf (aka Merrill's Wharf): home to fishing boats and the majority of the Port's lobster boats.
- Steamship Wharf (significant recent repairs and improvements with NBPA and Seaport Council funds): houses many fishing and lobster boats. Once served as a terminal for ferries operating between New Bedford, Martha's Vineyard, and Nantucket, and for service from Boston, New York City, and New London. Expansion is possible but limited due to proximity of the State Pier and the large vessels berthed there which impede maneuvering capabilities.
- Fisherman's Wharf (originally two piers – City Pier #3 and #4): provides additional berthing for the New Bedford fishing fleet and is currently overcrowded with limited space for expansion. Also docked here are the Alert (II), a passenger ferry to Cuttyhunk Island, and the Acushnet, Whaling City Tour's vessel providing harbor tours and launch and water taxi service. Dockage on these piers is available on a first come, first served basis.
- Coal Pocket Pier: used for berthing fishing and lobster boats and has assigned docking. Due to the Pier's size and orientation, expansion is not possible.

¹⁸ Port of New Bedford. Online at: <https://portofnewbedford.org/the-new-bedford-port-authority/>.

Table 5: Berthing Facilities in New Bedford Harbor¹⁹

Facility	Linear feet of berthing space	Number of Berths	Number of Vessels
Steamship	1,300	15	50
Leonard's	950	12	40
Fisherman's	940	9	30
Homer's	850	12	30
Coal Pocket	260	4	10

To support additional port services, the NBPA licenses exclusive and non-exclusive use of several berths on the Central Waterfront. Currently, these docking spaces are licensed to Cuttyhunk Water Taxi (a passenger/cargo ferry service) and Whaling City Launch Service.

The NBPA manages the 204-slip recreational marina at Pope's Island and also arranges and manages contracts with multiple cruise ship lines to use berthing facilities at State Pier.

The State also owns and manages a number of sites along the city's waterfront. The New Bedford State Pier is located at the heart of New Bedford's central waterfront and is a hub for cargo operations and passenger activity. The Pier is owned by the Commonwealth of Massachusetts through the Department of Conservation and Recreation (DCR). Under a Memorandum of Understanding by and between the Massachusetts Development Finance Agency (MassDevelopment) and DCR, the New Bedford State Pier is managed by MassDevelopment. Among the maritime activities on the State Pier are the SeaStreak ferries to Martha's Vineyard and Nantucket and the Cuttyhunk Ferry.

The New Bedford Marine Commerce Terminal, completed by the State in 2015 and managed by the Massachusetts Clean Energy Center, is a multi-purpose facility developed as the first facility in the nation specifically designed to both handle bulk, break-bulk, container shipping, and large specialty marine cargo, and to support the construction, assembly, and deployment of offshore wind projects.²⁰ Its 29-acre facility, including 21 acres of heavy-lift capacity, 1,200 feet of bulkhead, including 800 feet of deep draft berthing and 400 feet of barge berthing space has significantly expanded New Bedford's waterfront infrastructure. It has easy roadway connections to interstate highway system via I-95 or I-495 (via connections through New Bedford Route 18 and MA Route 140 and/or Route I-195).

In addition, there are a number of privately-owned facilities along the waterfront. Maritime International, 276 MacArthur Drive, has one of the largest USDA-approved cold treatment centers on the East Coast for the use of restricted imported fruit.

Several barge operations move aggregate and break-bulk cargo to the Islands of Martha's Vineyard and Nantucket.

- R.M. Packer Company Inc., with a terminal at 352 Herman Melville Blvd., is a marine transport and fuel storage operation. Packer also owns the only deepwater dock in Vineyard Haven capable of offloading large items from barges, and a bulk fuel terminal on Beach Road

¹⁹ Port of New Bedford. Online at <https://portofnewbedford.org/other-harbor-users>.

²⁰ Sasaki, Cecil Group, UMass Donahue Institute, FXM Associates, and Apex. 2016. New Bedford Waterfront Framework Plan.

in Vineyard Haven. Packer supplies home heating oil and gasoline, both retail and wholesale on the Island. Packer's Tisbury Towing and Transportation Co. transports gasoline and other petroleum products between New Bedford and Vineyard Haven.

- Toscana Corporation, a tug and barge company, operates out of Fish Island. Its 110-foot by 35-foot open-deck barge transports oversized or overweight cargo to Nantucket. The barge can carry up to 1,000 tons of bulk commodities such as aggregate and sand that if carried by truck would be roughly equivalent to thirty-five tractor trailers carrying thirty-five tons each on the Steamship Authority's vessels. The tug generally makes two trips per week to Nantucket, a 10-hour trip usually via Woods Hole, but occasionally through Quicks' Hole. The terminal facility is just off I-195, provides full access to the barge deck for large trucks, and has ample staging areas for queuing and parking. Toscana doesn't do any business on Martha's Vineyard because the Steamship terminal there isn't usable for bulk transfer.
- Two other tug companies operate from Fish Island: 41 North Offshore keeps its tug 'Kodiak' there and Tucker-Roy Marine Towing and Salvage has its workboats based there.
- Gateway Towing operates from the "Sand dock" off Herman Melville Boulevard. Sand is loaded onto barges and taken to New Haven, CT.
- The North Terminal area has potential, but is a complex area for redevelopment that is dependent on decisions by many small property owners and large future public investments such as the EPA expanded bulkhead project (the creation of 1500 linear feet of additional bulkhead with clean soil from future dredging operations) and the South Coast Rail extension.
- The Sprague Energy and Global terminal handles petroleum used by bunkers who fuel fishing vessels in the Harbor as well as distributors that provide fuel to residential customers. According to the Framework Plan²¹ this site has possible future cargo potential. The site is owned by a combination of the Commonwealth Gas Company and the Sprague Oil Company. Though some portions of the site are used, much is vacant and underutilized. Efforts to redevelop are complicated by significant environmental contamination.

In addition to the cargo moving through the Harbor, ferries operating from New Bedford/Fairhaven Harbor take passengers back and forth to Martha's Vineyard, Cuttyhunk Island, and Nantucket:

- Seastreak Ferry from the State Pier to Martha's Vineyard: between May – October to Oak Bluffs (1 Seaview Avenue), or from November 25-29 to Vineyard Haven and from May to October to Nantucket.
- The Cuttyhunk Ferry Company operates ferry service year-round between the State Pier (South Bulkhead) and Cuttyhunk Island.
- The Cuttyhunk Water Taxi operates an 18-passenger vessel from 52 Fisherman's Wharf to Menemsha, Martha's Vineyard, and Cuttyhunk.

Potential for Short Sea Shipping

There is certainly potential for and interest in short sea shipping from the Port of New Bedford. This is reflected in several studies, plans and policy documents concerning the port. Realizing this potential depends on future investments in port infrastructure and the economics of the service and competing uses.

In 2012-2013, the New Bedford Harbor Development Commission led The East Coast Marine Highway Initiative Partnership, which sponsored a study to develop strategies for the establishing viable Marine

²¹ *Ibid.*

Highway services along the M-95 Marine Highway Corridor.²² Such services would provide freight shippers with waterborne alternatives to truck and rail transportation. Following an initial screening of potential services based on cost per load, a short-haul loop linking New England and Mid-Atlantic ports, with a focus on New Bedford and Baltimore was among several selected for further analysis. The study detailed the myriad factors affecting service viability and ultimately concluded that even for the highest performing routes, operating costs exceed expected revenues. The study includes recommendations for overcoming the challenges and catalogs the benefits of marine highway services including reduced congestion on roads and highways, fewer greenhouse gas emissions, improved safety, and additional sealift military resources that support national defense.

The 2016 New Bedford Waterfront Framework Plan suggests "[t]he possibility also exists for marine highway (short sea shipping) in New Bedford. The market viability hinges, in part, on operational issues such as filling ships with cargo on the back haul. Yet, short sea shipping is a land consumptive operation and would need significant real estate to thrive in New Bedford."²³ The framework plan process highlighted the need for additional waterfront improvements. Next steps include deeper investigation of: expansion of cold storage and other needs for cargo on sites such as Marine Commerce Terminal or Eversource/Sprague waterfront, and improvements to road configurations in the South Terminal area to allow for large truck access and egress.

The New Bedford Regeneration Committee's 2014 report also noted that forecasts suggest that maritime cargo in the U.S. will grow dramatically in the coming years. Most of this increase will come from containerized freight loaded at the nation's largest ports, but there is potential that surging demand will lead to the development of hub-and-spoke short sea shipping lanes along the East Coast that could benefit the Port of New Bedford.²⁴

The Regeneration Committee's report says that, in the near term, the State Pier should continue to support break-bulk cargo handling, a business which has grown in recent years. The report continues, however, to suggest that in the long run the highest and best uses of the State Pier are not industrial. While the vast majority of industrial ports offer some public access to the waterfront, the public is almost completely shut out from New Bedford Harbor. The State Pier represents a singular opportunity to transform New Bedford's land-locked downtown into a water-side public retail and dining destination akin to those in other industrial ports, such as Baltimore, Boston, and Portland. Developing the State Pier with these goals (retail, dining, and other waterfront public activities) in mind would not compromise the Port's cargo business, which can be better supported in the more industrial areas of the Harbor, nor the commercial fishing industry, which does not land fish on the pier.

²² Parsons Brinckerhoff *et al.* 2013. East Coast Marine Highway Initiative M-95 Study Final Report. East Coast Marine Highway Initiative Awarding Authority.

²³ Sasaki, Cecil Group, UMass Donahue Institute, FXM Associates, and Apex. 2016. New Bedford Waterfront Framework Plan.

²⁴ New Bedford Regeneration Committee. 2014. Uniting in Pursuit of Growth and Opportunity, Final Report.

The Strategic Plan calls for the City to work with the state agencies that control major facilities in the Port to promote the expansion of the port's cargo business. Although the Port is not large enough to receive major container ships, its tonnage of refrigerated break bulk cargo has increased significantly in recent years in part because of the growing recognition of the port's advantage as a distribution point to New England and Eastern Canadian food retailers. There is room for further growth, including possibly in the business of short-sea shipping, but it will require clear coordination about marketing and leasing arrangements with the state agencies that operate in the Harbor. This plan further suggests that full development of North Terminal would expand access for fish processors, international shipping companies, and island freight services.

These planning documents seem to support future development of short sea shipping from private properties that now support bulk shipping, those properties targeted for future redevelopment, or the South Terminal area. The Steamship Authority-sponsored report²⁸ recommended the New Bedford State Pier as the New Bedford terminal for a potential freight ferry service to Martha's Vineyard.

The recent (2015) dredging of the federal channel increased water depth to facilitate anticipated cargo operations and the increase of shipping activities within the Harbor and reduced limiting restrictions on the size of commercial ships that can enter the Harbor. The increased depth to a minimum depth of -30' MLLW of the berth at the State Pier allows larger vessels to call on and remain at the State Pier without concern for tides.

There are several infrastructure projects in various stages of planning that would have a significant economic impact on the Harbor, region, and Commonwealth. Much of this is from Port of New Bedford's Strategic Plan 2018-2023.²⁹

- The North Terminal expansion project, currently planned as three phases, will provide up to 1,600 feet of additional bulkhead berthing space with deep water access, multi-modal connections to road and rail. The development of North Terminal would expand access for fish processors, international shipping companies, and island freight services. In addition, as the offshore wind industry continues to develop, the expansion of North Terminal would provide the Port with the capacity to handle two separate off-shore wind installation projects in the future.
- State Pier: The state recently invested approximately \$4 million to refrigerate the warehouses on the State Pier, which will enable the break-bulk cargo business on the pier to operate year-round. As detailed in several recent studies, after years of neglect, the state must now repair the buildings and significant portions of the pier's structure, either by replacing pilings or by building a bulkhead around the facility. Because the facility hosts the port's ferry and primary cargo-handling terminals, the renovations, which are estimated to be between \$20-25 million, are urgently needed.³⁰ However, long-term investment cannot begin until there is an understanding between the NBPA, the City and the State about future uses for the pier.

The State Pier Ferry Terminal is a terminus for ferries between Martha's Vineyard and Cuttyhunk in the Elizabeth Islands. The central location of the ferry terminal at State Pier is important for the continued success of the ferry and excursion boats.³¹

²⁸ Steamship Authority, 2017. A Proposed Service Model for a Freight Service between New Bedford and Martha's Vineyard

²⁹ New Bedford Port Authority. 2018. Port of New Bedford Strategic Plan 2018-2033.

³⁰ *Ibid.*

³¹ Sasaki, Cecil Group, UMass Donahue Institute, FXM Associates, and Apex. 2016. New Bedford Waterfront Framework Plan.

- The Route 6 Bridge is nearing the end of its useful life. Of the repair or replace options being further explored, a new bridge will allow better commercial access improving waterside connections between the lower and upper harbors, directly benefiting the North Terminal Project.

MassDOT has classified the New Bedford-Fairhaven Bridge as “functionally obsolete.” The bridge is a physical barrier to North Terminal for larger vessels and stymies the growth of the cargo and offshore wind industries. The lower harbor lacks space for continued development, leaving the upper harbor ripe for growth, but until the bridge is replaced to allow for wider clearance, the Northern Harbor will not realize its full economic potential. Of two proposed options, the NBPA will continue to press the state administration to fund the replacement of the bridge, which would cost approximately \$100 million rather than repair it at a cost exceeding \$45 million in the coming years.³²

- The City has studied the extension of the waterfront freight rail from State Pier to the New Bedford Marine Commerce Terminal. This rail extension to the Marine Commerce Terminal would open up new cargo development opportunities as well as access for the fish processors along South Terminal. The preferred alignment offers the opportunity to create a large waterside site with immediate freight and truck access.
- Repairs are needed along the city’s five commercial fishing piers that were constructed in the early 20th century. Pier 3, Steamship Pier, Coal Pocket Pier, Homer’s Wharf, and Leonard’s Wharf sustain the bulk of the harbor’s fleet and will need substantial repairs in the coming years.
- Pope’s Island Marina Upgrades: With 198 seasonal slips and dozens of transient moorings, Pope’s Island Marina has significant capacity to serve as the Port’s primary recreational boating center. Renovations are needed to handle today’s larger and more energy-intense recreational vessels. Many of the docks and slips are in need of repair or replacement, the entire marina is in need of electrical upgrades.
- Union Wharf in Fairhaven is another project that will provide infrastructure upgrades to allow economic growth, revitalizing an underutilized facility and providing badly needed additional berthing space to the harbor’s fleet of vessels.
- There remains a desire to bring the federal channel to its authorized depth of -30 MLLW. Additionally, there are at least 22 different properties/areas that are in need of and eligible for the state Enhanced Remedy Phase V dredging. One option that has been evaluated is to conduct the Phase V program in coordination with the USACE’s Federal Channel Dredging. A survey of users indicated that the combined projects would provide waterfront access for 60 additional commercial fishing vessels now offloading at out of state ports; the ability to compete for about 100,000 tons of bulk cargo now handled at marine terminals in Providence, RI that are destined for the New Bedford area and currently trucked to New Bedford; and the addition of new or expanded processing operations and ship repair and maintenance support to accommodate the 60 additional fishing vessels that would supply about 7 million pounds of additional landings.³³

FALL RIVER

Fall River is a city in Bristol County, Massachusetts, and is located on the eastern shore of Mount Hope Bay and at the mouth of the Taunton River. Mount Hope Bay has been an important part of Fall River’s industrial economy—past and present—providing vessel access both for commercial and passenger use.

³² New Bedford Port Authority. 2018. Port of New Bedford Strategic Plan 2018-2033. Online at: <https://portofnewbedford.org/strategic-plan-2018-2023/>

³³ Martin, 2016.

Ferry service to Newport and Block Island is available out of Mount Hope Bay, and recreational sailing is a common activity in the region. The Taunton River, which flows to Mount Hope Bay, is approximately 40 miles long, and provides important nursery and foraging habitat for a variety of commercially and recreationally important fish species including striped bass, blue fish, herring, and rainbow smelt.

Today, Fall River's coastline is a mix of commercial, industrial, and residential uses. Fall River has an extensive waterfront including a historic downtown area, which can be divided into three subareas: south waterfront (arts, museums, and parks including Battleship Cove and the Fall River State Pier), central waterfront (Route 79, Davol Street, and neighborhoods), and north waterfront (former Shell Oil site).³⁴ The Fall River Redevelopment Authority (FRRA) has recently sponsored two urban renewal plans, one of which focuses on these waterfront areas, and the other focuses on the downtown area.

The Fall River State Pier is one of several state piers owned by the Commonwealth of Massachusetts, and is located on the eastern bank of the Taunton River.³⁵ The Department of Conservation and Recreation is responsible for the oversight of the Fall River Pier Lines (the management firm of the pier) and guides major repairs and renovations.³⁶ Fall River Pier Lines has operated the State Pier facility since 1954 and is responsible for pier management and operations.³⁷

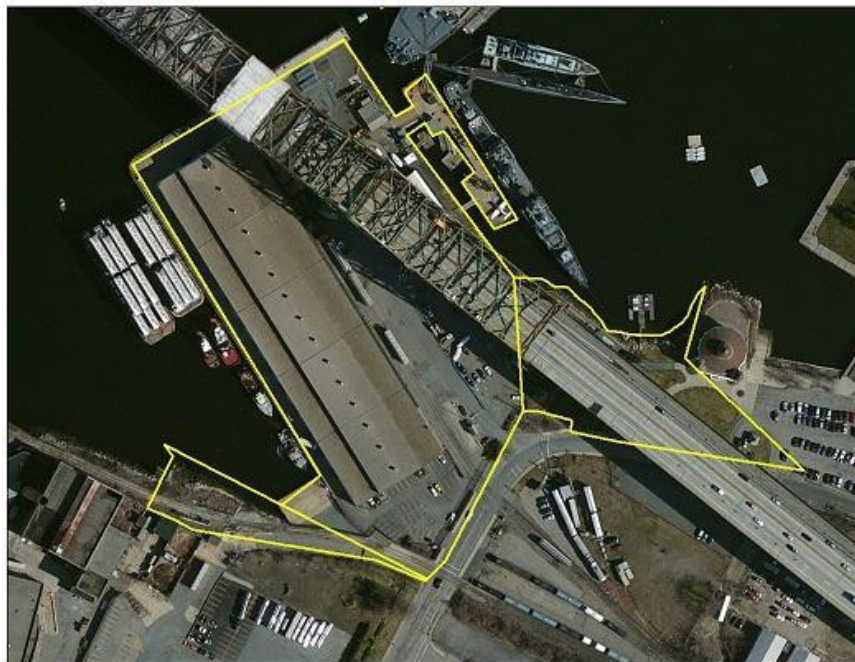


Figure 1: Map of the Fall River State Pier, with parcels outlined in yellow (Source: Clean Energy Center)

³⁴ Fall River Development Authority. Fall River Waterfront Urban Renewal Plan. September 2018. Online at: <https://www.fallriverma.org/wp-content/uploads/2018/06/20180904-Waterfront-URP-Draft-low-res.pdf>

³⁵ Karl F. Seidman Consulting Services and UrbanFocus LLC. Massachusetts State Piers: A Business and Operations Assessment. August 2016. Online at: https://files.massceec.com/state-piers-report-8-2-16_0.pdf

³⁶ *Ibid.*

³⁷ *Ibid.*

The Port of Fall River has a deepwater harbor with a channel of 35 feet and is the second most active port in Massachusetts (Boston being the most active).³⁸ The Fall River State Pier is 8.6 acres and includes two berths of 27 feet draft MLW; the South berth is 600' long and the West berth is 400' long, as well as a 96,000 square foot terminal storage building.³⁹ The port also has strong transportation infrastructure, with direct connections to three rail tracks.⁴⁰

The Fall River State Pier hosts a large amount of nautical activity, including modern cargo vessels, fishing vessels, a high speed ferry between Block Island and Newport, the Battleship Cove Museum, historic navy ships, and cruise ships.⁴¹ To assist the larger vessels, the port also has tug boats and service vessels.⁴² The battleship USS Massachusetts, a World War II memorial, and three other U.S. Navy vessels are berthed just northward of the State Pier along the Taunton River.⁴³

Fall River State Pier has a Roll-on, Roll-off ramp, and primarily imports and exports household goods and vehicles from Cape Verde, Azores, Brazil, Haiti, the Dominican Republic, and other areas in the Caribbean basin.⁴⁴ The Fall River Line Pier manages the general cargo and breakbulk industry that utilizes the pier, with Atlantic Shipping being the main cargo operator for the Fall River State Pier.⁴⁵ Atlantic Trade provides the imported products to stores and utilizes the pier's storage space.⁴⁶

Regarding possible future plans to update Fall River, the Fall River Redevelopment Authority (FRRA) has recently developed two urban renewal plans which contain potential recommendations on how to update Fall River's waterfront and downtown area ([The Fall River Waterfront Urban Renewal Plan](#) and [The Fall River Harbor and Downtown Plan](#)). The main objectives behind the Waterfront Urban Renewal Plan are to redevelop vacant land, and link that new development to the waterfront and adjacent neighborhoods, the Battleship Cove District, and the Shell Oil site.⁴⁷ The main objectives behind the Harbor and Downtown Plan are to create tourism-related destinations, and a plan for new investments in the waterfront and downtown area for service-related sectors.⁴⁸

Additionally, there has been interest by local stakeholders in converting parts of the pier from cargo activity to mixed-use development, including retail, a café, and a children's center.⁴⁹ The Battleship Cove Museum also has plans to expand and has completed a master plan.⁵⁰ Further, some stakeholders are

³⁸ World Port Source. Online at:

http://www.worldportsource.com/ports/commerce/USA_MA_Port_of_Fall_River_1514.php

³⁹ Fall River Line Pier, Inc., Marine Terminal Operations. Online at: <http://fallriverlinepier.com/>

⁴⁰ *Ibid.*

⁴¹ Fall River Line Pier, Inc., Marine Terminal Operations. Online at: <http://fallriverlinepier.com/shipping/dockage/>

⁴² Fall River Line Pier, Inc., Marine Terminal Operations. Online at: <http://fallriverlinepier.com/shipping/>

⁴³ Urban Harbors Institute. 2015 State of Our Harbors. 2015.

⁴⁴ Fall River Line Pier, Inc., Online at: <http://fallriverlinepier.com/>

⁴⁵ Fall River Line Pier, Inc., Massachusetts State Piers: A Business and Operations Assessment. August 2016. Online at: https://files.massceec.com/state-piers-report-8-2-16_0.pdf

⁴⁶ *Ibid.*

⁴⁷ Fall River Waterfront Urban Renewal Plan. September 2018. Produced by the Fall River Development Authority. Online at: <https://www.fallriverma.org/wp-content/uploads/2018/06/20180904-Waterfront-URP-Draft-low-res.pdf>

⁴⁸ Fall River Harbor and Downtown Plan. Online at: <https://harriman.com/fall-river-harbor-and-downtown-plan/>

⁴⁹ *Ibid.*

⁵⁰ *Ibid.*

interested in expanded cargo operations from Atlantic Shipping and a metal recycling firm.⁵¹ That said, these recommendations have not been evaluated by state agencies for potential or practicality.

Potential for Short Sea Shipping

Anecdotal information suggests that Fall River may not be an ideal location for a short sea shipping terminal, as the distance to travel by vessel from Fall River to reach Cape Cod and the Islands is quite lengthy. This distance impacts the practicality of utilizing this terminal for short sea shipping, as it will lead to enhanced vessel greenhouse gas emissions and increased time spent traveling for crew and products.

WOODS HOLE



Image: Woods Hole (Source: Google Earth)

Great Harbor, in Woods Hole, is located on the southern tip of Falmouth on Cape Cod. The harbor is situated with Buzzards Bay to the west and Vineyard Sound to the southeast. The Elizabeth Islands are directly southwest, separated from the mainland of Cape Cod by the Woods Hole Strait.

The harbor is notably home to many prominent scientific research organizations, including the Woods Hole Oceanographic Institution, Marine Biological Laboratory, Northeast Fisheries Science Center, USGS Coastal and Marine Science Center, and their associated research vessels.

The harbor supports extensive recreational boating activity, including a large mooring field in Great Harbor and the connected Eel Pond, and the Woods Hole Yacht Club; commercial fishing; as well as

⁵¹ *Ibid.*

sightseeing and charter boats. In addition, the harbor hosts the Steamship Authority terminal for passenger ferry and freight service to Martha's Vineyard.

The US Army Corps of Engineers (USACE) has conducted several major projects in the harbor, beginning in the 1870s with removing navigational hazards in the form of shoals and boulders at the entrance of Great Harbor and through the Woods Hole Strait.⁵² Following that, USACE constructed a breakwater in Great Harbor as well as stone piers and retaining walls at some of the wharves, dredged a channel into Little Harbor, and also dredged the Woods Hole Channel.⁵³ The current channel (the Strait) is 2,500 feet long, 13 feet deep, and 300 feet wide.⁵⁴ A 1,300-foot-long branch channel (Broadway), 13 feet deep, and 300 feet wide, turns southeast from Woods Hole Channel towards Vineyard Sound east of Nonamesset Island.⁵⁵

The Steamship Authority offers passenger, automobile, and truck freight ferry service from Woods Hole to both Vineyard Haven and Oak Bluffs on Martha's Vineyard. The traditional passenger and cargo ferries can carry a combination of passengers, cars, and trucks, with some trips specifically designated as freight vessel trips, with limited passenger service available. In the summer months of 2020, for the Woods Hole to Vineyard Haven route, the Steamship Authority scheduled ten round-trip freight vessel trips per day from Monday to Friday, and seven on Saturday and Sunday. In addition, there are also unscheduled freight vessel trips which are available to operate if needed. During the same time period, there were two unscheduled freight vessel trips per day from Monday to Thursday, and one unscheduled trip on Friday. From Monday to Saturday, one freight vessel trip per day is able to carry hazardous material, with two hazardous materials trips available on Wednesday.

During this time, there were no exclusive freight vessel trips scheduled from Woods Hole to Oak Bluffs. During the late spring (mid-May to mid-June) and fall (after Labor Day to late October), however, there are three freight vessel trips per day from Woods Hole to Oak Bluffs. During the late fall, winter, and early spring months (late October to mid-May), there are no trips of any kind schedule from Woods Hole to Oak Bluffs.

During the summer months of 2020, the Steamship Authority also scheduled nine daily round-trips to Vineyard Haven and ten daily round-trips to Oak Bluffs, with an added trip on Friday, Saturday, and Sunday to each location, that were not designated as freight vessel trips. These trips carry passengers and automobiles, and also are able to accommodate freight trucks.

Table 6: Number of Passengers, Automobiles, and Trucks Carried by the Steamship Authority to Martha's Vineyard and the Total for Martha's Vineyard and Nantucket in 2019. ⁵⁶

	From the Mainland to Martha's Vineyard and Return	Total for Martha's Vineyard and Nantucket
Passengers	2,425,787	3,004,436
Automobiles	414,967	478,990
Trucks	141,292	195,328

⁵² US Army Corps of Engineers. No date. Woods Hole Channel Navigation Project. Online at: <https://www.nae.usace.army.mil/Missions/Civil-Works/Navigation/Massachusetts/Woods-Hole/>

⁵³ *Ibid.*

⁵⁴ *Ibid.*

⁵⁵ *Ibid.*

⁵⁶ Steamship Authority. 2020. Traffic Report 1995-2020. Online at: https://www.steamshipauthority.com/writable/versioned_downloadable_forms/path/june_2020_traffic_statistics_for_website.pdf

Note: Traffic statistics represent one-way totals. A round-trip passage is counted as two.

Comparing the Woods Hole to Martha's Vineyard route to the total Steamship Authority traffic, this route accounts for approximately 81 percent of the total passenger traffic, 87 percent of the total automobile traffic, and 72 percent of the total truck traffic.

Woods Hole Terminal Reconstruction Project

In planning for continued operations, the Steamship Authority determined the need to conduct a reconstruction of the Woods Hole Ferry Terminal to address outdated and deteriorating infrastructure, improved ADA access, and address flooding concerns.⁵⁷

Already completed elements of the project include the initial feasibility study, a temporary terminal building in Woods Hole, and a new Steamship Authority administration building in Falmouth that opened in early 2018. In December 2017 Jay Cashman, Inc. was awarded the marine construction contract for the waterside work, the aspect of the project that comprises the majority of the budget and is the most time-intensive. "The overall [waterside and terminal building] project entails the phased demolition of all of the existing waterfront structures that include the current three ferry slips and supporting utilities to be replaced with three new ferry slips, two passenger loading piers, and comprehensive utility and stormwater management improvements. Following the waterside construction, landside improvements include site re-grading, a new ferry terminal building and equipment storage building, bus berths and overall reconstruction of site utilities and vehicle accommodations."⁵⁸ The majority of on-site construction work will be completed during the off-season from September to May to minimize the impact to ferry operations and the local community.⁵⁹ The project has an updated budget of approximately \$93 million and an estimated completion date of May 2025 at the earliest.⁶⁰

Potential for Short Sea Shipping

There is at least one unscheduled freight trip per day that can be utilized as needed throughout the year from Woods Hole to Vineyard Haven. In addition, the Steamship Authority has the ability to add an extra trip per day to Vineyard Haven by running the vessels at a faster speed and shortening the turn-around time between trips.⁶¹ This strategy has not been implemented due to the lack of demand for an additional trip.⁶² As a result, the Steamship Authority has additional capacity built into their schedule and operations that can be utilized if and when necessary.

Over the past several years there have been increasing complaints from the residents of Falmouth, particularly those who live on Woods Hole Road approaching the harbor, about the noise, speeding, and traffic caused by passing freight trucks. In response to the Steamship Authority's proposed 2020 schedule, including a 5:30AM freight trip from Woods Hole to Vineyard Haven, 50 Falmouth residents submitted a signed petition to "object to the scheduling of freight from Woods Hole prior to 6:00AM due to the sleep deprivation caused by the early morning noise impact of Steamship Authority-related freight

⁵⁷ Massachusetts Department of Environmental Protection. 2017. Chapter 91 Recommended Final Decision. Online at: https://www.steamshipauthority.com/writable/files/WHTRP/chapter_91_license_recomm_final_decision_-_2016-025.pdf

⁵⁸ The Steamship Authority. No date. Woods Hole Terminal Reconstruction Project. Online at: <https://www.steamshipauthority.com/WHterminalreconstruction>

⁵⁹ *Ibid.*

⁶⁰ The Steamship Authority. 2020. 2020 Port Council Meeting Minutes. Online at: https://www.steamshipauthority.com/writable/files/port_council_minutes_2020_through_june.pdf

⁶¹ Davis, Bob. Personal Communication. August 7, 2020.

⁶² *Ibid.*

trucks on Falmouth and Woods Hole residents".⁶³ Similar concerns continued to be voiced in response to the Steamship Authority's proposed 2021 schedule.⁶⁴

In response to these concerns, beginning in 2018 the Steamship Authority adopted specific new operating policies for the 5:30AM freight trip so as to minimize the noise generated by these trucks during their early morning drive to the terminal. These policies include (1) limiting the size of the trucks on the 5:30AM trip to less than 40 feet in length; (2) requesting that freight shippers instruct their drivers not to exceed the speed limit in Falmouth, or 35 miles per hour, whichever is lower; and (3) reviewing all of the Steamship Authority's efforts to mitigate truck noise, including prohibiting trucks from arriving at the terminal earlier than necessary to be processed and loaded onto the ferry.⁶⁵ In addition, the Steamship Authority has developed a Woods Hole/Falmouth Noise and Traffic Mitigation Working Group that will hold monthly public meetings to hear and address ongoing concerns.⁶⁶

SOMERSET

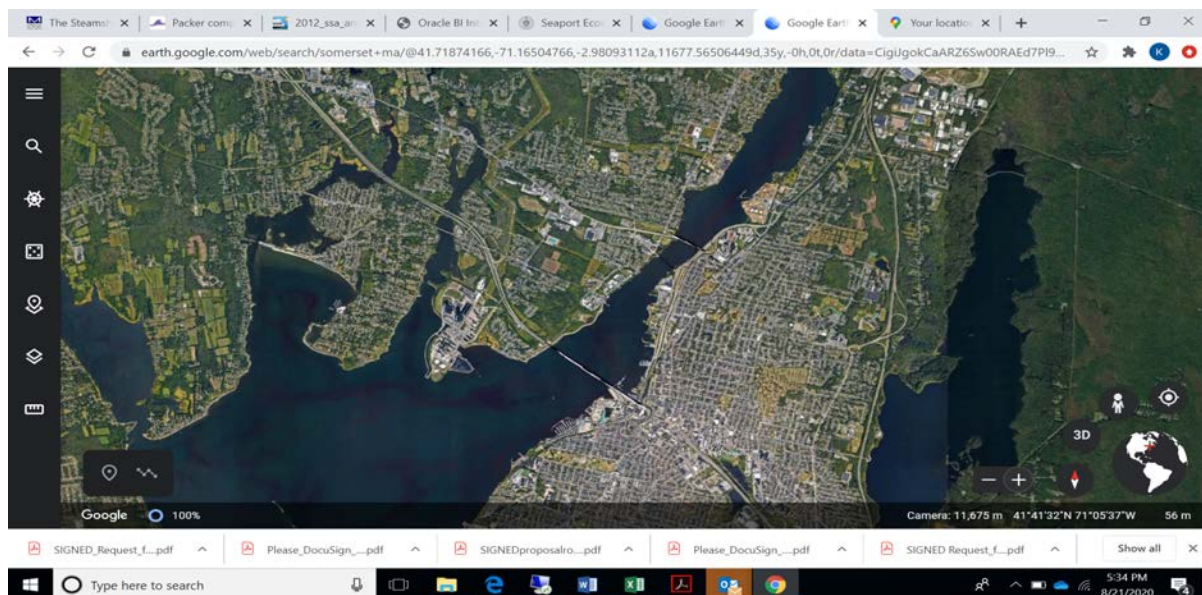


Image: Somerset, MA (Source: Google Earth)

Somerset is a town in Bristol County, Massachusetts which has a population of more than 18,000 people, and is located to the west of Fall River on both the Taunton and Lee Rivers. The Somerset portion of the

⁶³ The Steamship Authority. 2019. Report Issued under Section 15A of the Authority's Enabling Act on the Proposed 2020 Summer Operating Schedules of the Woods Hole, Martha's Vineyard and Nantucket Steamship Authority. Online at:

https://www.steamshipauthority.com/writable/versioned_downloadable_forms/path/report_-_proposed_2020_summer_operating_schedules_-_final.pdf

⁶⁴ The Steamship Authority. 2020. Report Issued under Section 15A of the Authority's Enabling Act on the Proposed 2021 Summer Operating Schedules of the Woods Hole, Martha's Vineyard and Nantucket Steamship Authority. Online at:

https://www.steamshipauthority.com/writable/versioned_downloadable_forms/path/report_-_proposed_2021_summer_operating_schedules_with_appendices_-_2020-08-18_approved_part1.pdf

⁶⁵ *Ibid.*

⁶⁶ The Steamship Authority. 2020. Revised Meeting Notice Woods Hole/Falmouth Noise and Traffic Mitigation Working Group. Online at:

https://www.steamshipauthority.com/writable/files/wh_noise-traffic_mit_working_group_-_2020-08-26_-_revision_1.pdf

Taunton River is mainly brackish water, and current water-dependent activities in Mount Hope Bay and this portion of the river include mostly recreational boating and fishing.

Years ago, Somerset was a significant shipping community with heavy commercial use. Specifically, Brayton Point within Somerset was the site of a major coal port for 50 years; however, the fuel oil distribution facilities closed in 2017. Brayton Point was then acquired by the Commercial Development Company (CDC) in 2018. After reconstruction and renovation, Brayton Point opened in 2019 as the Brayton Point Commerce Center to primarily be used as support for offshore wind.

The newly established center is capable of component manufacturing, staging, maintenance, and operation for offshore wind and other related sectors.⁶⁷ Surrounded by the waters of Mount Hope Bay, neighboring land uses include a primarily town-owned wetland (Ripley Street Parcel) and a residential neighborhood of more than 100 homes, situated to the southwest of the property.⁶⁸

The Brayton Point Commerce Center is accessible on its eastern side by a 34.5-foot (10.5 m) deep dredged channel that approaches the parcel from the southeast.⁶⁹ The southeastern side of the center contains the facility wharf and dock. The wharf is 700 feet long and 60 feet wide, and was primarily utilized for offloading coal from ships.⁷⁰ Additionally, a swing-arm offloading pipe is available for offloading liquid products.⁷¹ A 500-foot fuel offloading pier extends to the southeast from the wharf, and contains transfer piping. Another berth, which is 650 feet, is adjacent to the fuel offloading pier southeast from the wharf.⁷²

⁶⁷ Brayton Point Commerce Center. About the Project. Online at:

<http://www.braytonpointcommercecenter.com/about/>

⁶⁸ Massachusetts Clean Energy Center. Massachusetts Offshore Wind Ports & Infrastructure Assessment: Brayton Point Power Point Site, Somerset MA. May, 2017. Online at:

https://files.masscec.com/Brayton_Point_FinalReport%20%28FV2%29_0.pdf

⁶⁹ *Ibid.*

⁷⁰ *Ibid.*

⁷¹ *Ibid.*

⁷² *Ibid.*



Figure 2: Map of Brayton Point Commerce Center (with parcels outlined in yellow). (Source: The Massachusetts Clean Energy Center)

While offshore wind is not yet in Massachusetts waters, the Brayton Point center has already begun heavy lift port operations.⁷³ Brayton Point now can handle bulk cargo, heavy lift cargoes, and building materials from both domestic and international locations, including dry bulk carriers up to 64,000 DWT ultramax bulkers.⁷⁴ The first cargo shipment included 30,000 MTs of deicing salt from the Atacama Desert Region of Chile in 2019.⁷⁵ As of March, 2020 Brayton Point has received nine vessel calls, which included offshore wind research vessels, yacht transporters, bulk carriers, and tug and barge units.⁷⁶

CDC is leasing the property to Panagea and Carver Stevedoring (also known as Patriot Stevedoring and Logistics) to conduct cargo and port operations at the Brayton Point site.⁷⁷ It is anticipated that Panagea

⁷³ Commercial Development Company, Inc. Brayton Point Commerce Center Receives First Cargo Shipment to New Marine Commerce Terminal. Online at: http://www.cdcco.com/press-release/brayton-point-commerce-center-receives-first-cargo-shipment-to-new-marine-commerce-terminal/?fbclid=IwAR0-cvXimk_JnO2x7w4Yx6AZdC3Z1dkjPp-CLxxwqQkqsReiupi0KHKUiwk

⁷⁴ *Ibid.*

⁷⁵ *Ibid.*

⁷⁶ Commercial Development Company, Inc. Brayton Point Redevelopment Project Moves Closer to Viability as Manufacturing & Logistics Hub for Offshore Wind. Online at: <http://www.cdcco.com/press-release/brayton-point-redevelopment-project-moves-closer-to-viability-as-manufacturing-logistics-hub-for-offshore-wind/>

⁷⁷ NewportRI.com. Newport-based Pangaea to conduct port operations at Brayton Point. Online at: <https://www.newportri.com/news/20191104/newport-based-pangaea-to-conduct-port-operations-at-brayton-point>

will likely bring international ocean freight into Brayton Point. All cargos must be precleared with Patriot Stevedoring and Logistics, who manages the port operations at Brayton Point.⁷⁸

Potential for Short Sea Shipping

Given that Brayton Point just re-opened and offshore wind is still in the planning stages, there is potential capacity at the site for short sea shipping operations. Anecdotal information collected through interviews confirmed this, noting that Somerset could have the space to support short sea shipping vessels, cargo, and activity. That said, similar to Fall River, Somerset may not be an ideal location for a short sea shipping terminal, given the distance from Martha's Vineyard as compared with other sites. Further, interviews with town representatives suggest that though capacity may exist at the site, the town is not interested in freight activity that brings trash into the port.

OAK BLUFFS

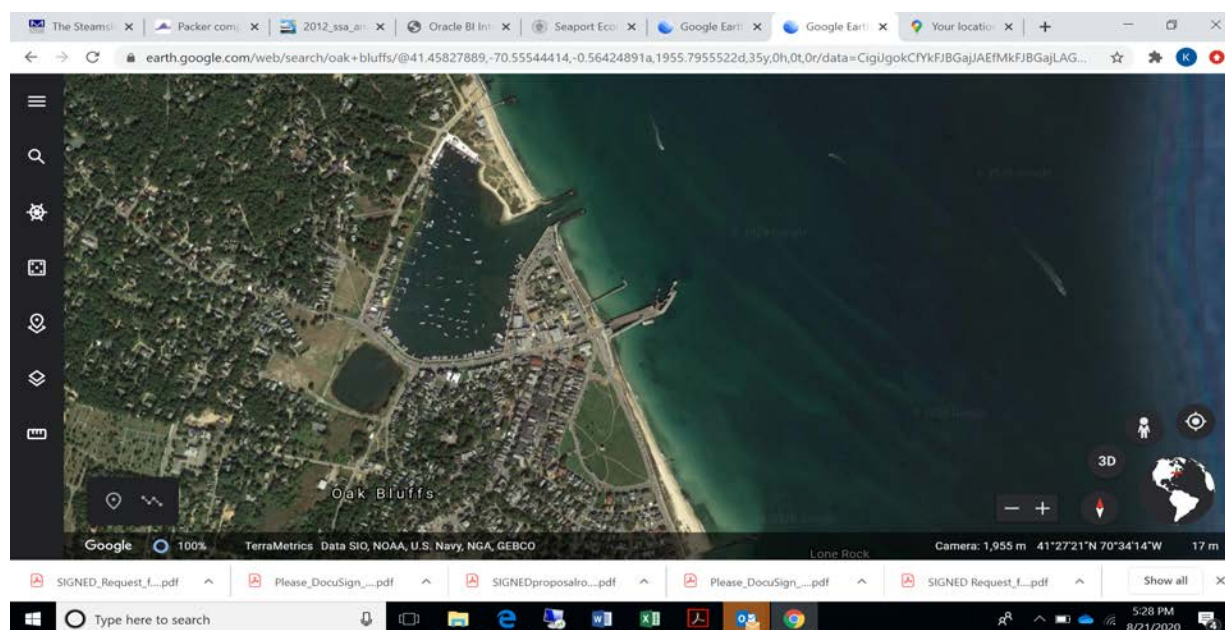


Image: Oak Bluffs (Source: Google Earth)

Oak Bluffs, located on the northeastern side of Martha's Vineyard, is roughly nine miles from the ferry docks in Woods Hole and is one of the two island-based ports used by the Steamship Authority to ship freight to and from the Island. Oak Bluffs Harbor, located just north of the Steamship Authority's dock, supports a variety of uses including commercial fishing and recreational boating. With slip and mooring fees, fuel sales, docking fees, and other revenue, the harbor is an important economic resource, generating approximately one million dollars annually for the town. The enclosed harbor and facilities therein require ongoing maintenance such as replacement of pilings and dredging of the entry channel. Discussions are underway about raising the height of the stone jetties and considering other improvements to provide for better protection against storms and flooding.⁷⁹

⁷⁸ Moran Shipping Agencies, Inc. Online at:

<http://ri.ports.moranshipping.com/Pages/Terminal%20Information.aspx?TID=14&PID=5>

⁷⁹ Oak Bluffs Master Plan Update Committee. 2019. Oak Bluffs Comprehensive Master Plan.

The Steamship Authority's wooden dock, located just south of the enclosed harbor, can accommodate one ferry at a time. The pier consists of staging areas for passengers as well as for cars and trucks. The wooden dock can support trucks up to 80,000 pounds. Land-side, an additional staging area for cars and trucks can accommodate a few dozen vehicles. Staging area and dock improvements were conducted in 2010.⁸⁰

In the spring of 2020, engineering work at the Oak Bluffs terminal indicated a need to repair or replace 35 pilings in order to maintain current levels of activity at the site. The project was put out to bid and work is underway to make those repairs.⁸¹ The Town is also exploring options to make the area more resilient to the impacts of climate change, citing the need for repairs to the seawall and improvements at the ferry docks themselves.

In its recent master planning process, the town indicated that Oak Bluffs experiences a higher impact than other island communities relative to the ferry service, noting traffic congestion, the need for additional capacity to respond to an emergency, and the use of harbor and dock space. The plan also acknowledges some benefits of the ferry service, mostly having to do with passenger use (embarkation fee revenue and tourist traffic) as well as dock space revenue.

The Oak Bluffs ferry terminal is used for approximately half of the Steamship Authority's daily trips to Martha's Vineyard during the summer⁸², however most of the trips are primarily passenger and car trips. During the summer months of 2020, the Steamship Authority scheduled 11 roundtrip trips per day to Oak Bluffs from Woods Hole on Fridays, Saturdays, and Sundays. The Steamship Authority ran one less trip per day during the remainder of the week.⁸³ The Steamship Authority does not use the Oak Bluffs terminal during the winter months for regularly-scheduled service, but does schedule trips to Oak Bluffs between mid-May and mid-October.⁸⁴ These trips were scheduled on the *M/V Nantucket* and the *M/V Martha's Vineyard* in 2020—both primarily car and passenger vessels.

Potential for Short Sea Shipping

The Oak Bluffs terminal could be explored as a possible destination for any new short sea shipping activities originating from New Bedford or other off-Cape harbors. The terminal's current 80,000 pound limit for vehicles would need to be addressed either through infrastructure improvements or through limits to truck sizes and/or weights. Due to the exposed nature of this docking facility, it is unlikely that reliable year-round service would be a possibility here. Further, any expansion of seasonal services would need to take into consideration factors such as impacts to traffic congestions—which is already an issue in the area—and scheduling of trips—during the summer months, the high level of use at this facility leaves little room for additional trips.

⁸⁰ Martha's Vineyard Commission. 2015. Martha's Vineyard Transportation Plan—Draft June 2015. Online at: https://www.mvcommission.org/sites/default/files/docs/Draft%20MVTP%202015_0.pdf

⁸¹ Steamship Authority. 2020. Minutes of the Woods Hole, Martha's Vineyard and Nantucket Steamship Authority: The Meeting in Public Session: May 12, 2020. Online at: https://www.steamshipauthority.com/writable/files/ssa_minutes_public_session_through_may_19_2020.pdf.

⁸² Oak Bluffs Master Plan Update Committee. 2019. Oak Bluffs Comprehensive Master Plan.

⁸³ Steamship Authority. 2929 Martha's Vineyard Ferry Schedule. Online at: https://www.steamshipauthority.com/writable/versioned_downloadable_forms/path/2020approvedoperatingschedules_20200803rev.pdf.

⁸⁴ *Ibid.*

The waterfront of the enclosed harbor to the north of the Steamship Authority's dock is currently occupied by other uses. In addition, the shallow water depths within the enclosed harbor, the mooring fields within the harbor, and channel restrictions make it unlikely that freight service could operate in this area.

VINEYARD HAVEN

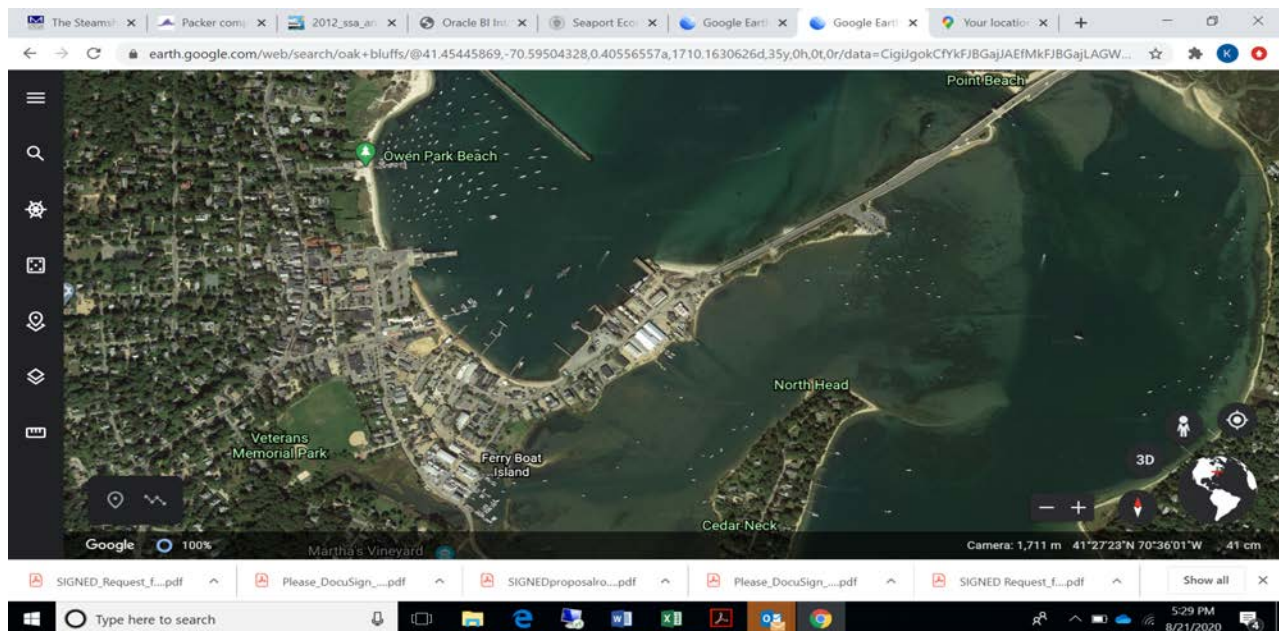


Image: Vineyard Haven (Source: Google Earth)

The village of Vineyard Haven in the town of Tisbury, MA rises up from the harbor and provides a pedestrian-friendly downtown area that attracts residents and visitors. Along the waterfront, Vineyard Haven is the site of the larger and more sheltered of the Steamship Authority's two on-island ports used to ship freight to and from the island. The land to the east of the ferry terminal includes private terminals and working waterfront uses such as ship building, excursion vessels, and shipping activities. The harbor itself is very active during the summer season, supporting ferry and freight service, and commercial and recreational boating and fishing.

The working waterfront in Tisbury is part of the Vineyard Haven Harbor District of Critical Planning Concern (DCPC). The DCPC regulations

Seek to maintain the Vineyard Haven Harbor as a year-round working waterfront with facilities for loading and unloading bulk cargo; to promote the Town's longstanding tradition of marine industries, services and maritime hospitality including ship design, building, and repair, traditional sail training and sailing yacht charters, and the provision of necessary services to visiting mariners; to enhance and protect views of the harbor and pedestrian access along the waterfront by discouraging waterfront development and by maintaining the beaches in their natural, unimpeded and unimproved condition; to protect fish, shellfish and wildlife habitats and improve water quality; to provide residents

*with opportunities for marine recreation; and to promote harbor safety, avoid harbor congestion and prudently manage the limited navigational resources of the harbor.*⁸⁵

The DCPC regulations also prohibit the maneuvering of a ferry more than 150 feet long and in an arc of 180 degrees or more (this restriction does not apply to lawfully conducted activities authorized prior to August 11, 2000).

Built in 1994/1995, the Steamship Authority's Vineyard Haven terminal operates year-round. The 325-foot Union Wharf provides berthing for two vessels at a time. A staging area for vehicles exists at the base of the pier, and another staging area exists just south of the pier adjacent to Water Street. The terminal handles as many as seven round-trip freight trips a day during winter months (January-March). During the summer season, the number of trips increases to as many as 11 a day.

Flooding at the Steamship Authority's facility was a prominent concern in the town's Municipal Vulnerability Preparedness (MVP) Plan, which noted that even a two-day shut down of ferry service can have an impact on the entire island, especially during the off-season when the Oak Bluffs terminal is closed. As such, the MVP Plan recommends a comprehensive supply chain vulnerability assessment.⁸⁶

While Vineyard Haven is the primary terminal for transporting freight to the island, the Town has made a concerted effort to minimize the impact of freight and other large vessels due to congestion and capacity issues in Vineyard Haven. To that end, around 1999, the harbormaster and the Steamship Authority made an agreement that only one of the Steamship Authority's vessels could be underway in the inner harbor at any given time.⁸⁷

In addition to the freight service provided by the Steamship Authority, R.M. Packer Company operates a bulk fuel terminal on Beach Road, the only deepwater dock in the harbor that is suitable for offloading large cargo from barges. Tisbury Towing (under the same ownership as R.M. Packer Company) transports gasoline and other petroleum products to the island from New Bedford. In an interview with the Vineyard Gazette, Ralph Packer suggested that his enterprises resulted in 34,000 less cars travelling over the Bourne Bridge in a year.⁸⁸ Anecdotal reports indicate that the site has been committed to serving offshore wind for the next four to five years.⁸⁹

⁸⁵ Vineyard Haven Harbor District of Critical Planning Concern (DCPC) Regulations. Online at: https://www.tisburyma.gov/sites/g/files/vyhli1321/f/uploads/vineyard_haven_harbor_dcpc_regulations.pdf.

⁸⁶ Horsely Witten Group. 2018. Summary of Findings: Tisbury Municipal Vulnerability Preparedness Workshop. Online at: https://www.tisburyma.gov/sites/g/files/vyhli1321/f/uploads/tisbury_mvp_report_reduced.pdf.

⁸⁷ Veno, William G. 2000. Martha's Vineyard Port Areas Infrastructure Capacity Study. Online at: <https://www.mvcommission.org/sites/default/files/docs/portareainfrastructurestudy.pdf>

⁸⁸ Sennott, W., Wells, J. 2019. R.M. Packer Ordered to Pay Hefty Fines for Environmental Violations. Vineyard Gazette. October 31, 2019. Online at: <https://vineyardgazette.com/news/2019/10/31/rm-packer-ordered-pay-hefty-fines-environmental-violations>.

⁸⁹ Discussion during the Steamship Authority's 8/26/2020 Woods Hole/Falmouth Noise and Traffic Mitigation Working Group.

Potential for Short Sea Shipping

Vineyard Haven is the most feasible site on Martha's Vineyard to receive shipments of non-bulk freight from off-Cape points of origin given the Steamship Authority's existing infrastructure and the fact that the terminal operates year-round.

In addition, Vineyard Haven's other sites along the town's working waterfront may provide an alternative site for non-bulk freight shipping. In particular, the facility owned by R.M. Packer may offer opportunities.

Should a change in port of origin result in additional freight coming through Vineyard Haven, considerations should be given to how additional vessel traffic could result in increased harbor congestion, a need to revise existing ferry schedules, impacts to other harbor uses, and a need to address landside traffic circulation issues.

OBSERVATIONS AND CONCLUSIONS

Based on our initial research, we have made the following observations and conclusions:

1. Shipping non-bulk freight between locations off of Cape Cod and the islands (Martha's Vineyard and Nantucket) has potential, but many factors would play a role in its viability, such as the site of the mainland port and the length of the journey, licensing conditions with the Steamship Authority (*e.g.*, limits on sizes of trucks, prices of trips), political will, and scheduling of port facilities on-island. Other options exist to reduce truck traffic in Woods Hole and emissions overall. These options include:
 - a. Freight consolidation off-Cape to ensure that the trucks going to the islands are at maximum capacity, rather than sending over trucks only partially full
 - b. Reduction of waste to reduce the number of garbage trucks needing to make the trip off-island
 - c. Short-sea shipping from locations outside of Massachusetts that might result in fewer trucks on state roads and fewer emissions.
2. The mainland off-cape port in Massachusetts that is best positioned to handle non-bulk freight is New Bedford; however, shipping non-bulk freight to the islands is not a priority use of the waterfront for the City. Other ports may be too far from the islands to make short-sea shipping financially viable.
3. The demand for freight on the island is largely fixed, barring some significant change in activities on-island (*e.g.*, major development projects). Further, the Steamship Authority currently has capacity to transport additional freight. Given these factors, it does not seem that there is unmet demand for freight shipping. If freight were to be shipped from a non-Cape site however, it is possible that the newly freed capacity could result in changes in schedules, an increase in the number of passenger cars transported, or some other modification to current practices.

Exploring Short-Sea Shipping as an Alternative to Non-Bulk Freight Trucking in Southeastern MA

Task 2 Deliverable
January 2021

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INTRODUCTION

The movement of freight between mainland Massachusetts and the islands of Nantucket and Martha's Vineyard is essential to the economy, culture, and security of the island communities. Almost all non-bulk freight that travels to and from Martha's Vineyard passes through Woods Hole aboard Steamship Authority vessels. The current methods of transporting freight via vessels necessitates the use of trucks.

The focus of this chapter is to quantify the impacts of non-bulk freight movement to/from the Island through Woods Hole on traffic volume and congestion. This analysis will inform the exploration of potential reductions in emissions from shippers having access to a mainland port closer to their origins (deliverable 3). Specifically, this deliverable presents 1) an overview of traffic conditions in 2019 as they relate to the movement of freight trucks travelling on board Steamship Authority vessels and 2) an estimate of the reduction of trucks on key road segments in the study area if an off-Cape ferry service could be established.

EXISTING CONDITIONS

I. Types of Freight Transported by the Steamship Authority

Some of the most common types of non-bulk freight brought to Martha's Vineyard via trucks include mail, express packages, fuel, food (38% of all truck trips), and building material (17% of all truck trips), while waste and recyclables are shipped off-island (13% of all truck trips).⁹⁰

Freight is transported on Steamship Authority vessels in trucks operated by several different carriers, most notably Cape Cod Express, Carroll's Trucking, Sun Transportation, FedEx, UPS, Hallsmith-SYSCO, and Sid Wainer & Sons.⁹¹

Patriot Party Boats also provides limited seasonal shipment of freight such as auto parts and building supplies⁹² between Falmouth and Oak Bluffs.

II. Current Number of Trucks Moved by the Steamship Authority

As noted in the deliverable for Task 1, in accordance with the Enabling Act of the Woods Hole, Martha's Vineyard and Nantucket Steamship Authority, all non-bulk freight shipped between mainland Massachusetts and the islands of Martha's Vineyard and Nantucket is conducted, licensed, or permitted by the Steamship Authority.⁹³ This shipment of freight occurs on vessels dedicated to freight shipment as well as on passenger and car ferries.

Some freight is brought to the islands on large trailers (50-70 feet long and 80,000lbs. loaded) and transferred onto smaller trucks (25-35 feet) for delivery.⁹⁴ In addition, some gasoline and propane are brought to Martha's Vineyard on Steamship Authority vessels.

Non-bulk freight shipment to Martha's Vineyard occurs on the following routes:

- Woods Hole to Oak Bluffs terminal (1 Seaview Avenue, Oak Bluffs, MA), operated by the Steamship Authority
- Woods Hole to Vineyard Haven terminal (1 Water Street, Vineyard Haven, MA), operated by the Steamship Authority

Of the two on-island ports, most freight passes through Tisbury. This is due to limiting factors at the Oak Bluffs terminal including seasonal closures and the exposed nature of the pier.

Numbers of trucks specifically carrying non-bulk freight and volumes of non-bulk freight to each port are not publicly available. Further, some trucks making these trips are empty (*e.g.*, making return trips) or only partially full, thus it is not possible to calculate a clear volume of freight based on the number of trucks per vessel. We can, however, estimate the number of freight trucks based on the number of parking spaces they require. The table below describes commercial and non-commercial trucks travelling on Steamship Authority vessels, as categorized by the number of parking spaces required.

⁹⁰ Martha's Vineyard Commission. 2015. Martha's Vineyard Transportation Plan—Draft 2015. Online at: https://www.mvcommission.org/sites/default/files/docs/Draft%20MVTP%202015_0.pdf.

⁹¹ Martha's Vineyard Commission. 2015. Martha's Vineyard Transportation Plan – Draft June 2015. Online at: https://www.mvcommission.org/sites/default/files/docs/Draft%20MVTP%202015_0.pdf.

⁹² Martha's Vineyard Commission. 2015. Martha's Vineyard Transportation Plan – Draft June 2015. Online at: https://www.mvcommission.org/sites/default/files/docs/Draft%20MVTP%202015_0.pdf.

⁹³ Enabling Act of the Woods Hole, Martha's Vineyard and Nantucket Steamship Authority, St. 1960, c. 701, § 5.

⁹⁴ Martha's Vineyard Commission. 2015. Martha's Vineyard Transportation Plan – Draft June 2015. Online at: https://www.mvcommission.org/sites/default/files/docs/Draft%20MVTP%202015_0.pdf.

Table 7: All trucks travelling to and from Martha's Vineyard for 2018, 2019, and 2020.

NUMBER OF TRUCKS CARRIED TO / FROM MARTHA'S VINEYARD 2018													
TO / FROM MARTHA'S VINEYARD	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTAL
1 SPACE TRUCKS & TRAILERS	5,562	5,709	5,315	7,510	8,664	7,977	7,009	6,731	7,640	7,856	7,284	6,929	84,186
2 SPACE TRUCKS (20' LESS THAN 35')	1,422	1,465	1,570	2,075	2,657	2,845	2,870	2,782	2,230	2,327	1,963	1,692	25,898
3 SPACE TRUCKS (35' LESS THAN 55')	561	518	602	826	1,015	1,187	1,028	1,075	950	999	564	607	9,932
4 SPACE TRUCKS (55' LESS THAN 65')	1,176	1,049	1,167	1,300	1,523	1,642	1,735	1,784	1,264	1,242	1,169	1,171	16,222
5 SPACE TRUCKS (65' AND GREATER)	62	104	157	214	178	150	76	81	99	98	85	93	1,397
TOTAL TO / FROM MARTHA'S VINEYARD	8,783	8,845	8,811	11,925	14,037	13,801	12,718	12,453	12,183	12,522	11,065	10,492	137,635

NUMBER OF TRUCKS CARRIED TO / FROM MARTHA'S VINEYARD 2019													
TO / FROM MARTHA'S VINEYARD	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTAL
1 SPACE TRUCKS & TRAILERS	5,893	5,848	7,578	8,072	8,678	8,104	7,431	6,893	7,784	7,495	7,326	6,824	87,926
2 SPACE TRUCKS (20' LESS THAN 35')	1,590	1,452	1,806	2,259	2,600	2,752	2,795	2,633	2,122	2,151	1,685	1,689	25,534
3 SPACE TRUCKS (35' LESS THAN 55')	565	502	780	901	1,123	1,144	1,055	1,189	1,069	920	602	552	10,402
4 SPACE TRUCKS (55' LESS THAN 65')	1,199	1,083	1,256	1,354	1,539	1,552	1,700	1,676	1,254	1,163	1,090	1,092	15,958
5 SPACE TRUCKS (65' AND GREATER)	105	144	187	215	194	128	85	83	79	96	85	71	1,472
TOTAL TO / FROM MARTHA'S VINEYARD	9,352	9,029	11,607	12,801	14,134	13,680	13,066	12,474	12,308	11,825	10,788	10,228	141,292

NUMBER OF TRUCKS CARRIED TO / FROM MARTHA'S VINEYARD 2020													
TO / FROM MARTHA'S VINEYARD	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTAL
1 SPACE TRUCKS & TRAILERS	6,112	6,200	5,423	3,164	5,481	7,769	7,515	7,218	7,367	8,201	6,895	6,867	78,212
2 SPACE TRUCKS (20' LESS THAN 35')	1,665	1,593	1,540	924	1,568	2,381	2,566	2,399	2,263	2,167	1,665	1,646	22,377
3 SPACE TRUCKS (35' LESS THAN 55')	456	498	530	334	591	794	792	765	711	822	768	814	7,875
4 SPACE TRUCKS (55' LESS THAN 65')	1,215	1,067	1,225	911	1,339	1,710	1,707	1,534	1,423	1,536	1,303	1,402	16,372
5 SPACE TRUCKS (65' AND GREATER)	140	138	155	150	132	117	100	60	96	98	111	78	1,375
TOTAL TO / FROM MARTHA'S VINEYARD	9,588	9,496	8,873	5,483	9,111	12,771	12,680	11,976	11,860	12,824	10,742	10,807	126,211

Using these figures, we can estimate that the number of freight trucks carried on Steamship vessels to Martha's Vineyard was as follows (using trucks requiring two to five spaces).

Table 8: Estimates of non-bulk freight trucks travelling between Woods Hole and Martha's Vineyard for 2018, 2019, and 2020..

Year	Number of trucks requiring 2-5 spaces
2018	53,449
2019	53,366
2020	47,999

III. Traffic Data

Traffic volume was examined in the context of (1) the Bourne and Sagamore bridges, and (2) local Falmouth roadways.

Bourne and Sagamore Bridges

According to MassDOT's Transportation Data Management System (MS2), the Annual Average Daily Traffic (AADT) for the Sagamore Bridge (Location ID 708) and the Bourne Bridge (Location ID 707) for Years 2015 – 2019 were:

Table 9: Annual Average Daily Traffic (AADT) across the Bourne and Sagamore Bridges (2015-2019)

Year	Sagamore AADT	Bourne AADT	Total AADT
2019	61,701	44,240	105,941
2018	53,884	46,496	100,380
2017	55,245	46,621	101,866
2016	48,481	44,536	93,017
2015	50,871	45,173	96,044

Using the daily annual average, we can calculate that approximately 38,668,465 vehicles passed over the Bourne and Sagamore Bridges (combined) in 2019.

$$105,941 \text{ vehicles/day} \times 365 \text{ days/year}$$

These annual averages do not reflect seasonal variation at the bridges, which can be significant. For example, in 2017, the summer annual average daily traffic over both the Sagamore and Bourne Bridges was 130,817 vehicles per day, as compared to the annual average daily total of 101,886 for both bridges.

If we assume that all trucks travelling via vessel between Woods Hole and Martha's Vineyard also pass over either the Bourne or Sagamore bridges, then in 2019, the 53,366 freight truck trips on Steamship Authority Vessels represented approximately 0.138% of all traffic travelling over the bridges that year.

$$53,366 \text{ truck trips on Steamship Authority vessels} / 38,668,465 \text{ vehicles passing over the bridges}$$

The data, gathered by MassDOT, combines cars and trucks, *i.e.*, there is no way to separate the data by vehicle type. Although it is possible to determine the size vehicle traveling over these bridges, as they are classified into vehicle length classes in feet (0-13, 13-35, 35-61, and 61+), the Bourne and Sagamore Bridges data for 2019 included some gaps and could not be used to calculate numbers or percentages of vehicles by size.

In terms of congestion on the bridges, the Cape Cod Commission uses the following volume to capacity ratios to determine a roadway's congestion:⁹⁵

Table 10: Volume to capacity ratios used to determine levels of congestion.

Symbol	V/C Ratio Threshold	Level of Service (LOS)
●	0.8	C or Better
●	0.9	D
●	1.0	E
●	>1.0	F

⁹⁵ Cape Cod Commission. 2016. 2016 Regional Transportation Plan.

Based on Cape Cod Commission analyses, most traffic monitoring in the vicinity of the bridges shows a failing congestion grade during summer months (Figure 1).⁹⁶

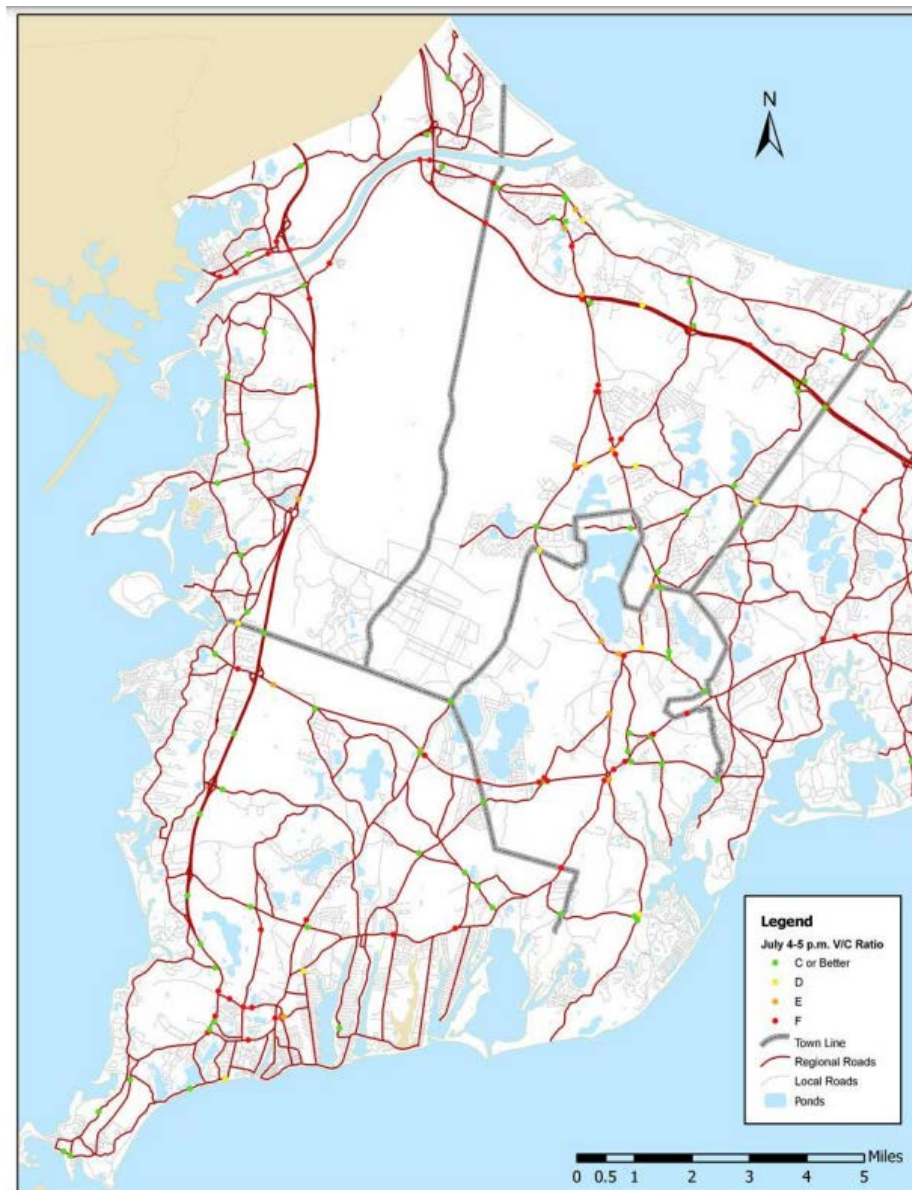


Figure 3: Upper Cape Cod Volume to Capacity Ratios. (Source: Cape Cod Commission)

Falmouth Roadways

In 2019, the Average Annual Daily Traffic (AADT) on Route 28 south of Brick Kiln Road going both north and south was 21,089 vehicles, which had grown from 21,005 in 2018 (Location ID: S18-028-096-11). Additionally, in 2018 the AADT on Woods Hole Road (south of Oyster Pond Road) was 7,966.⁹⁷

If one assumes that all trucks travelling to and from Martha's Vineyard during 2019 passed each of these two points, then:

⁹⁶ Cape Cod Commission. 2016. 2016 Regional Transportation Plan.

⁹⁷ Cape Cod Traffic Counts Viewer. Online at: <https://www.capecodcommission.org/our-work/traffic-counts/>

- Trucks travelling on the Steamship Authority ferries made up 0.693% of those vehicles on Route 28 south of Brick Kiln Road.
- Trucks travelling on the Steamship Authority ferries made up 1.84% of those vehicles on Woods Hole Road (south of Oyster Pond Road).

Though freight trucks are a very small percent of overall traffic on Falmouth roadways, community members in Falmouth have voiced concern over the impact that freight activity to and from Martha's Vineyard has on the local roadways and community character. In addition to complaints about noise, residents are concerned about congestion and safety on roadways nearest to the ferry terminal. The Steamship Authority has worked to reduce noise and safety concerns through size limits to trucks departing on the 5:30AM vessel, however community members continue to seek additional measures to reduce the disruptions caused by freight trucks servicing the Island.

The roadways leading to the Woods Hole ferry terminal receive a congestion grade of C or better in the analyses performed by the Cape Cod Commission (figure 1).⁹⁸

POTENTIAL SHIFTS AND RELATED IMPACTS

One key factor that influences whether a shift in freight movement to an earlier port would be possible is the desirability of that port and its operations. Time and cost savings are critical factors to consider, which are influenced by predictability of traffic and congestion, length of trip, and schedules.

Should demand exist for an additional off-Cape port, a standard 220-foot supply vessel with a deck size of 145 feet long by 35 feet wide, including the ramp (e.g., a vessel similar in size to the *M/V Katama* freight vessel already in use by the Steamship Authority)⁹⁹ could carry a variety of trucks of different sizes. For emissions modelling purposes in deliverable 3, we estimate that a vessel such as this would carry a combination of trucks equivalent to eight tractor-trailers and eight box trucks for each one-way trip. Using a base estimate of 16 trucks/vessel trip, a service offering an average of one round trip/day could move 11,680 trucks/year (Table 5). To move all 53,366 freight trucks travelling in 2019, a service would have needed to offer an average of more than four round trips/day.

Given the seasonal fluctuation in demand for freight over the course of a year, it is unlikely that a freight service would offer the same number of trips per day. A more realistic scenario would be offering the highest number of trips during summer weekdays and the lowest number of trips during winter weekends.

In addition to demand, other factors could contribute to the scheduling of ferry services out of a port other than Woods Hole. For example, to reduce traffic, a new service might focus on offering more trips during summer months when Cape Cod roads are most congested. Additionally, for purposes of addressing noise concerns from Falmouth residents, a new service might run in the early morning to replace the 5:30AM trip out of Woods Hole.

⁹⁸ Cape Cod Commission. 2016. 2016 Regional Transportation Plan.

⁹⁹ Steamship Authority. Vessels. Online at: <https://www.steamshipauthority.com/about/vessels>.

Table 11: Number of freight trucks transported under different scenarios

	1 round trip/day	2 round trips/day	3 round trips/day	4 round trips/day
Number of trucks per day	32	64	96	128
Number of trucks per week	224	448	672	896
Number of trucks per year	11,680	23,360	35,040	46,720

Given that the number of trucks using Steamship Authority vessels represents less than 0.2% of all traffic passing over the Bourne and Sagamore Bridges, it is unlikely that shifting these vessels to an earlier port of origin will have much impact on bridge traffic. Further, impacts to the overall volume on Falmouth roadways, generally, might also be negligible. However, removing trucks from Falmouth roadways—especially if strategically timed— might have noticeable impacts on volume and congestion in the immediate vicinity of the ferry terminal and may reduce noise and safety hazards.

If efforts were made to reduce volume and/or congestion through the removal of freight trucks from local roadways, it would be important to ensure that cars and smaller trucks seeking to travel by ferry would not take the place of the rerouted freight trucks and reduce any benefits associated with the decrease in truck numbers.

CONCLUSIONS & RECOMMENDATIONS

Roadway volume attributed to non-bulk freight in 2019, analyzed as the percent of total road traffic, shows that less than 0.14% of traffic passing over the Bourne and Sagamore bridges, and less than 2% of traffic on Woods Hole Road (south of Oyster Pond Road) was attributed to vessels travelling on Steamship Authority ferries. Efforts to reduce congestion by shifting some or all freight trucks to an off-Cape port would likely have minimal results.

While freight trucks are a small portion of the Cape's total traffic, the shipment of freight via truck is impacted by general congestion on Cape Cod roadways which may increase travel time and influence a shipping company's desire to operate from a Cape Cod-based port.

To better understand the various impacts these freight trucks have on Falmouth, the community may benefit from an analysis that explores roadway speed, safety, noise and other factors of interest.

Additionally, stakeholders could explore other options to reduce the impacts of freight trucks on roadways, including freight consolidation, shifts in ferry schedules, and strategies to reduce overall traffic such as enhanced public transportation.

Should a new off-Cape port be identified, it will be important to ensure that shifting operations to an off-Cape location does not simply transfer the issues to a new location.



Exploring Short-Sea Shipping as an Alternative to Non-Bulk Freight Trucking in Southeastern MA

Task 3 Deliverable

October 2021

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PURPOSE

This document presents an analysis of greenhouse gas (GHG) emissions by trucks and vessels moving non-bulk freight between mainland Massachusetts and Martha's Vineyard. The analysis compares the emissions that result from trucking and shipping this freight to and on vessels operating out of (1) Woods Hole Steamship Authority Terminal in Falmouth, MA, the "existing condition," and (2) shifting a portion of this freight through the State Pier in the Port of New Bedford, the "scenario condition." For both, the on-island destination is the Steamship Authority (SSA) terminal in Vineyard Haven, MA.

The methods and data contained in this report should allow readers to conduct their own analyses of different scenarios if desired. However, to fully understand the information presented in this report and in any future analyses using this data, it is necessary to clarify the following:

1. The truck emissions presented here are an underestimation of actual emissions. Data are not available on the points of origin for freight trucks travelling to Woods Hole, therefore mileage calculations begin from intercept points that all trucks would pass through along traffic routes to and from the mainland terminals.
2. New Bedford was selected as a port for a potential new ferry service based on the results of the analysis of mainland ports presented in Deliverable 1. The selection of New Bedford is purely for purposes of analysis and is in no way an indication that the City has endorsed its involvement in freight shipment activities to and from Martha's Vineyard.
3. The analysis is based on existing conditions and current practices (*e.g.*, vessels and trucks similar to those currently used). It does not look at practices such as freight consolidation that could reduce the number of overall truck and vessel trips, nor does it consider future shifts in the amount of freight shipped on and off the Island.
4. The intent of the scenario selected is not to suggest that this is the *best* scenario, but instead to provide an alternative to existing conditions for comparison purposes.
5. While the focus of this report was on emissions, a number of other factors would likely inform any decision to move any freight shipment to New Bedford. Those factors might be financial, logistical, and/or based on matters pertaining to equity, environmental justice, safety, other harbor uses, and/or additional factors.

METHODOLOGY

We calculated estimates of emissions from the trucks that carried non-bulk freight to and from the Woods Hole SSA terminal and emissions from the vessels that moved these trucks across Vineyard Sound to the SSA terminal in Vineyard Haven in 2019 (the most recent year with complete data unaffected by the COVID-19 pandemic). For comparison, we modelled emissions generated by trucking a portion of this freight to and from the State Pier in New Bedford and then shipping it to the terminal in Vineyard Haven. The methodologies for these calculations are described below.

To conduct our analysis, we:

5. Identified the emissions associated with a single one-way vessel trip for (1) a vessel travelling between Woods Hole and Vineyard Haven, and (2) a vessel travelling between New Bedford and Vineyard Haven, based on engine tier.
6. Identified the emissions for a single truck trip, based on intercept points/distance travelled.

7. Modeled the emissions of both vessels and trucks based on:
 - a. “Existing Condition” emissions, using 2019 numbers, for the number of freight trucks and vessels that transported freight between Woods Hole and Martha’s Vineyard, and
 - b. “Scenario Condition” emissions, using 2019 numbers, for the number of freight trucks that would be transported on roughly three round-trip vessel passages per day, as well as related vessel emissions for those passages.
8. Compared the emissions from the “existing conditions” and “scenario conditions” calculations.

I. Vessel Emissions

The calculation of emissions from marine vessel engines is a function of trip duration, operational patterns, and vessel type.

A. Vessel Routes

The shipping route between the State Pier in New Bedford and the SSA terminal in Vineyard Haven (Figure 1) (the “New Bedford Route”) was based on Hvide Marine’s (Seabulk) experience operating a freight service out of New Bedford in 2000 and 2001 under agreement with the SSA. The existing “Woods Hole” route to Vineyard Haven was obtained through observations of Automatic Identification System (AIS) data.¹⁰⁰



Image: New Bedford State Pier

New Bedford Route: We estimated emissions of vessels travelling between the New Bedford State Pier and the SSA terminal in Vineyard Haven. Despite its current physical condition, the State Pier’s size and location makes it one of the best options for shipping freight via trucks, assuming it can be repaired to safely support them. Multiple assessments, including engineering reports, repair requests, and other various rehabilitation proposals (see deliverable from Task 1 for more information) document the condition as well as the costs associated with making repairs and upgrades. Funding and local/state support would be required to make the State Pier a viable terminal for an island freight operation.

¹⁰⁰ Marinetraffic.com

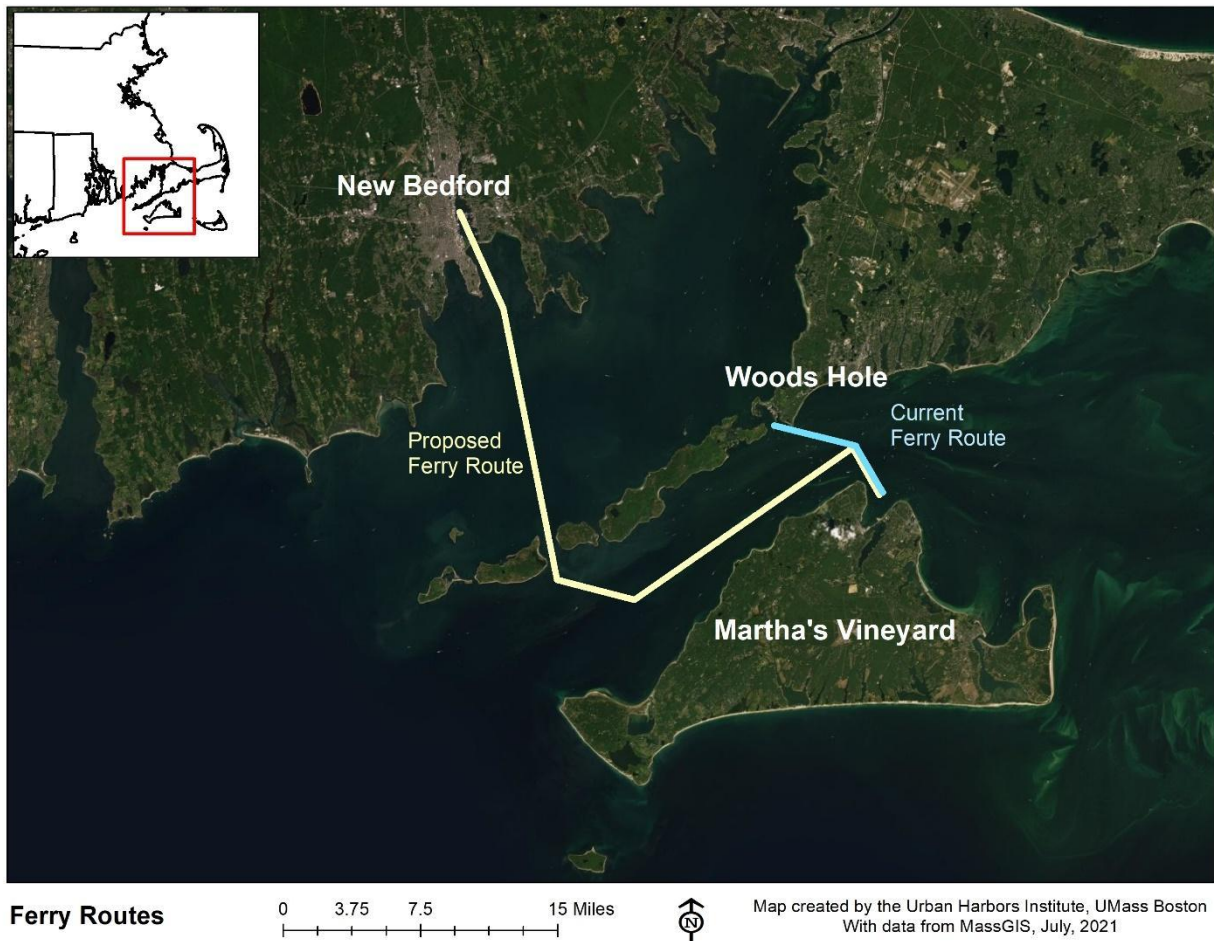


Figure 4: Potential Ferry Route from New Bedford, MA to Vineyard Haven, MA and Current Ferry Route from Woods Hole, MA to Vineyard Haven, MA

While the most direct route between New Bedford and Vineyard Haven is through Woods Hole passage, the heavy currents, congestion, and other safety factors make navigation through that area difficult. Instead, vessels would likely transit through Quicks Hole, which adds approximately 30 minutes to the trip, but provides a consistently navigable and safer route between New Bedford and Martha's Vineyard.

We estimated an average trip time of 2.5 hours for a one-way trip between New Bedford and Vineyard Haven. This estimate is based on the experience of the pilot freight service operated by Hvide Marine between New Bedford and Martha's Vineyard in 2000-2001 and includes time spent underway and time maneuvering at the dock.



Image: Quicks Hole

Woods Hole Route: The Woods Hole route (see Figure 1) is the existing route used to transport non-bulk freight via Steamship Authority vessels. The estimated duration of this trip is 75 minutes, including time spent maneuvering and underway.



Image: Steamship Authority, Woods Hole

B. Vessel Types and Capacity

This analysis was based on a standard 220-foot supply vessel with a deck size of 145 feet long by 35 feet wide, including the ramp, which is the same dimensions as the *M/V Katama* freight vessel already in use by the Steamship Authority.¹⁰¹

With this size, we estimated the vessel could carry a variety of trucks of different sizes. For modelling purposes, we estimated that a vessel would carry a combination of trucks equivalent to eight tractor-trailers and eight box trucks for each one-way trip.

The Steamship Authority reports that 53,366 trucks (20-65 feet+) made a one-way trip to/from Martha's Vineyard in 2019.¹⁰² Due to the fact that some freight vessels also transport cars, and some car ferries also transport freight trucks, we based our existing condition and scenario calculations on the number of freight vessels that would be needed to transport 53,366 trucks if they only travelled via freight vessel.

We calculated emissions for both routes based on the same type of Offshore Supply Vessels with different levels of engine emissions, consistent with the standards established for Tier I through Tier IV engines¹⁰³. For purposes of comparison, we used the same rate of fuel consumption for the Woods Hole route and the New Bedford route.

¹⁰¹ Steamship Authority. Vessels. Online at: <https://www.steamshipauthority.com/about/vessels>.

¹⁰² Steamship Authority. Number of Trucks Carried To/From Martha's Vineyard, 2018-2020. Personal communication with Sean Driscoll, July 3, 2021.

¹⁰³ As described in 40 CFR 1042.



Image: *M/V Katama*. Image source: Steamship Authority:
<https://www.steamshipauthority.com/about/vessels>

C. Fuel Consumption

Trip duration is used to estimate the number of gallons of fuel burned by vessel per trip. The amount of fuel burned is the basis for determining the carbon emissions for each trip. It is important to note that the number of gallons of fuel burned per hour does not change based on engine type, therefore the carbon emissions are the same regardless of tier of engine in a vessel. Additionally, the duration of the trip also provides an estimate of kilowatts, which provides the NO_x for each tier of engine.

Vessels transition between different operational modes during a trip—*e.g.*, maneuvering at the docks and in transit/underway—and time in each mode is associated with a speed and engine load with distinct emissions characteristics. For this study an average operational capacity of 77 percent was used for all vessel emission calculations based on an analysis of vessel operational patterns revealed by Automatic Identification System (AIS) data¹⁰⁴ for the existing Woods Hole to Vineyard Haven route and the experience of Hvide Marine's operation of a freight service from New Bedford to Martha's Vineyard in 2000 and 2001.

Freight vessels used by the SSA for the Woods Hole service and assumed for the New Bedford route operate on marine diesel fuel.

D. Vessel Emission Calculations

When calculating vessel emissions, the primary interest is in CO_2 and NO_x , therefore these are the focus of our analysis.

NO_x was determined by calculating the average kilowatts (kW) for the vessel multiplying by the maximum allowable NO_x limit for each tier of vessel, as shown in Table 1.

The CO_2 calculation involved multiplying the fuel burned per hour (110 gal/hr) times the length of the trip and then dividing by 10.084 kg Carbon/gallon of Diesel Fuel.¹⁰⁵ These calculations represent a one-way trip of one vessel.

¹⁰⁴ See online at: www.marinetraffic.com

¹⁰⁵ EPA. 2005. Average Carbon Dioxide Emissions Resulting from Gasoline and Diesel Fuel. (See: <https://nepis.epa.gov/Exe/tiff2png.exe/P1001YTG.PNG?-r+75+-g+7+D%3A%5CZYFILES%5CINDEX%20DATA%5C00T%5C0001251%5CP1001YTG.TIF>).

Table 12: Tier I-IV NOx Emission Limits for Ship Engines (amendments to Marpol Annex VI)

Regulation	NOx limit
Tier I	17 g/kWh
Tier II	14.4 g/kWh
Tier III	3.4 g/kWh
Tier IV	1.8 g/kWh

Table 13: Emissions for One One-Way Vessel Trips

New Bedford Route -- 1 trip						
Engine Type	NO _x limit (g/kWh)	KW (3800 HP Engine) 77%	Transit time	Gal/Hr	NO _x emission (kg)	CO ₂ (kg)
Tier I	17	2181 kw	2.5 Hours	100	92.69	2,521.00
Tier II	14.4	2181 kw	2.5 Hours	100	78.52	2,521.00
Tier III	3.4	2181 kw	2.5 Hours	100	18.54	2,521.00
Tier IV	1.8	2181 kw	2.5 Hours	100	9.81	2,521.00
Woods Hole Route -- 1 trip						
Engine Type	NO _x limit (g/kWh)	KW (3800 HP Engine) 77%	Transit time	Gal/Hr	NO _x emission (kg)	CO ₂ (kg)
Tier I	17	2181 kw	0.75 Hours	100	27.81	756.30
Tier II	14.4	2181 kw	0.75 Hours	100	23.55	756.30
Tier III	3.4	2181 kw	0.75 Hours	100	5.56	756.30
Tier IV	1.8	2181 kw	0.75 Hours	100	2.94	756.30

II. Truck Emissions

We used a three-step process to calculate and compare emissions released by freight trucks under “existing conditions” (e.g., traveling to Woods Hole for vessel departure) and “scenario conditions” (e.g., rerouting some trucks to New Bedford for vessel departure):

- Step 1: Determine Freight Truck Routes – First, we consulted with freight experts to determine the common routes taken by freight trucks in Massachusetts which would board vessels in Woods Hole. We determined intercept points and associated miles travelled
- Step 2: Calculate Emissions Released by Each Freight Truck - To calculate freight truck emissions, we utilized emission data from the Federal Highway Administration¹⁰⁶ for NO_x, VOC, CO₂, and PM10. In particular, we used the data provided for combination trucks and single-unit trucks.

¹⁰⁶ Federal Highway Administration. 2016. Freight Quick Facts Report. Online at: <https://ops.fhwa.dot.gov/publications/fhwahop16083/ch2.htm>.

- Step 3: Calculate Truck Emissions for 2019 Existing Conditions and Scenario Conditions – To determine a change in truck emissions, we calculated the emissions released under “Existing Conditions” with all trucks traveling to Woods Hole, and “Scenario Conditions” with the addition of a New Bedford ferry service (e.g., some trucks would now travel to the New Bedford State Pier instead of Woods Hole). The example schedule for a New Bedford ferry service consists of 1-3 roundtrip vessel trips per day from the New Bedford State Pier to Vineyard Haven, Martha’s Vineyard.



Image: Trucks and cars on a freight vessel from Martha’s Vineyard.

Determine Freight Truck Routes

As a first step to calculating truck emissions, we categorized the current routes that trucks are utilizing when transporting freight between Woods Hole and Martha’s Vineyard. For the scope of this project, we were not able to determine each truck’s *entire trip from origin to destination*, as each truck’s actual starting point, specific route, and time of travel were not known. Because of this, we selected “intercept points” along common truck routes (e.g., Wareham and New Bedford) to calculate emissions. We used the same route *to and from* the ferry terminal.

Based on existing data¹⁰⁷, most freight trucks departing on a ferry from Woods Hole travel through either Wareham (38%) or New Bedford (39%) to ultimately reach Woods Hole (see Table 3). A small percentage (22%) of freight originates on Martha’s Vineyard and Cape Cod.

¹⁰⁷ The data used for this analysis draw from a previous unpublished study by Craig Johnson, a member of this project team.

Table 14: Intercept Points in Eastern Massachusetts for Trucks Carrying Non-Bulk Freight

Intercept Points	Wareham	New Bedford	Martha's Vineyard	Cape Cod
Percent total	38.207%	39.262%	17.111%	5.420%

Since we could not determine each truck's route in entirety from start to finish, the emissions calculations herein should be considered an underestimation of the full emissions generated by moving freight between the mainland of Massachusetts and Martha's Vineyard.

Wareham Intercept Point:

For purposes of our calculations, freight truck trips originating from or returning to points north or northwest of Wareham were intercepted at the intersection of I-495 and I-195, with those travelling to Woods Hole taking a route from MA-25 E to MA-28 S to Woods Hole Road to Crane Street to Cowdry Road. See Figure 2 and Table 4 for the route and mileage between Wareham and Woods Hole.



**Route Map: Wareham, MA to
Steamship Authority Terminal in Woods Hole, MA**

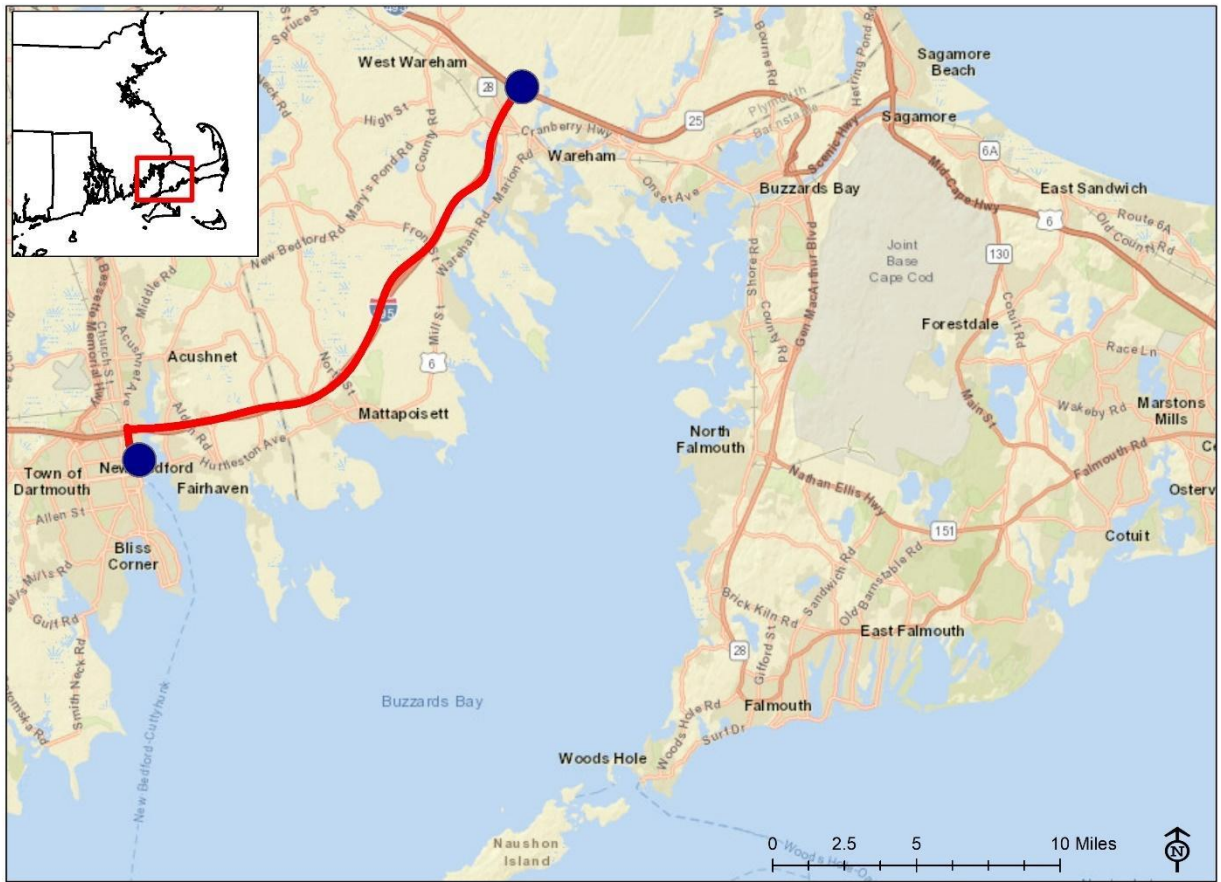
Map created by the Urban Harbors Institute, UMass Boston
With data from MassGIS, July, 2021

Figure 5: Wareham MA to Steamship Authority in Woods Hole - Route Map

Table 15: Wareham MA to Steamship Authority in Woods Hole Route - Road Segment Details

Road	Miles
MA-25 E	10
MA-28 S	0.8
MA-28 S	4
MA-28 S	9.6
MA-28 S	0.3
Woods Hole Road	3.3
Crane Street	0.056629
Cowdry Road	0.070833
Total Miles	28.127

Additionally, we assumed freight trucks travelling through Wareham to New Bedford took I-195 west to MA-18 S. See Figure 3 and Table 5 for the route and mileage between Wareham and the New Bedford State Pier.



**Route Map: Wareham, MA to
New Bedford State Pier, MA**

Map created by the Urban Harbors Institute, UMass Boston
With data from MassGIS, July, 2021

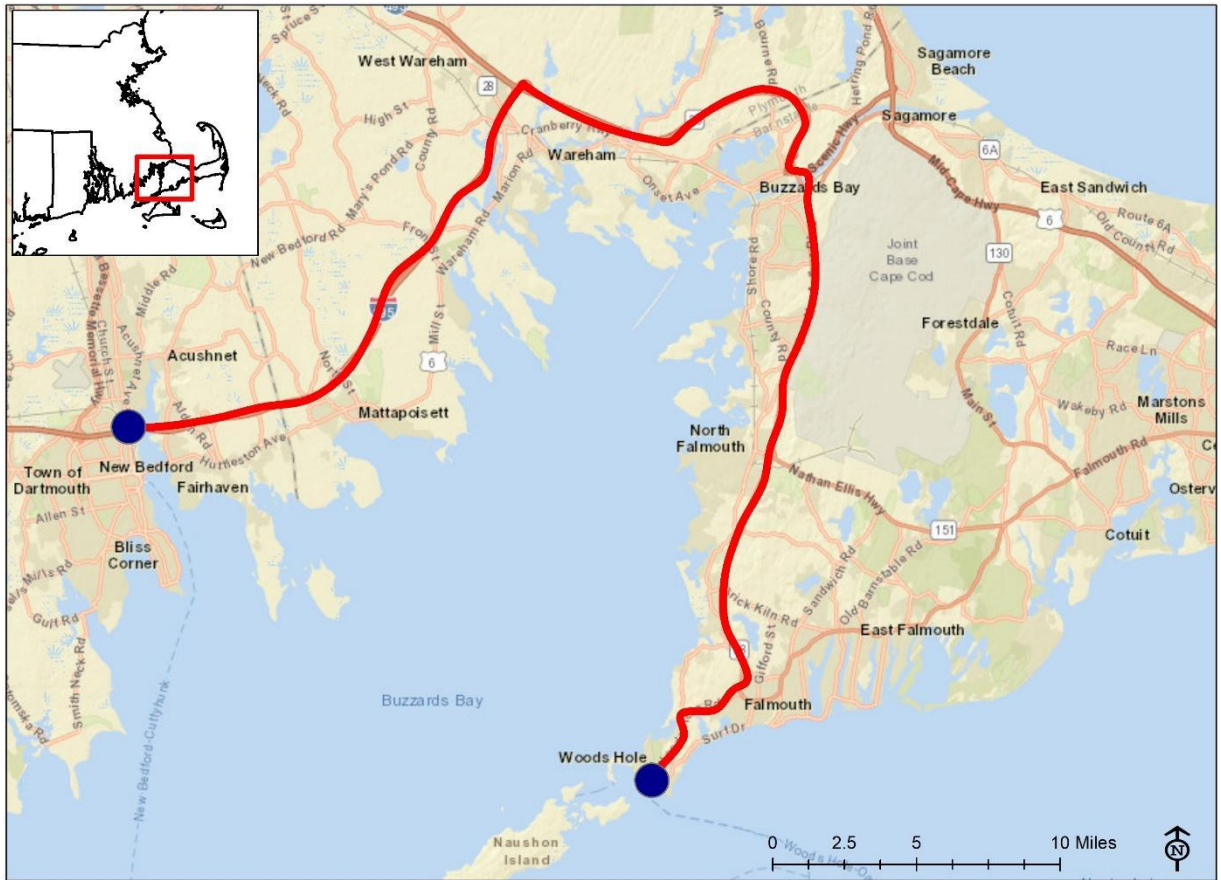
Figure 6: Wareham MA to New Bedford State Pier - Route Map

Table 16: Wareham MA to New Bedford State Pier - Road Segment Details

Road	Miles
I-195 W	14.5
MA-18 S	1.7
Total Miles	16.2

New Bedford Intercept Point

For the purposes of our calculations, freight truck trips originating west of New Bedford and traveling to Woods Hole began at the intersection between I-195 and MA-18S and took via I-195 to MA-25 E to MA-28 S to Woods Hole Road to Crane Street to Cowdry Road (Figure 4 and Table 6).



**Route Map: New Bedford, MA to
Steamship Authority Terminal in Woods Hole, MA**

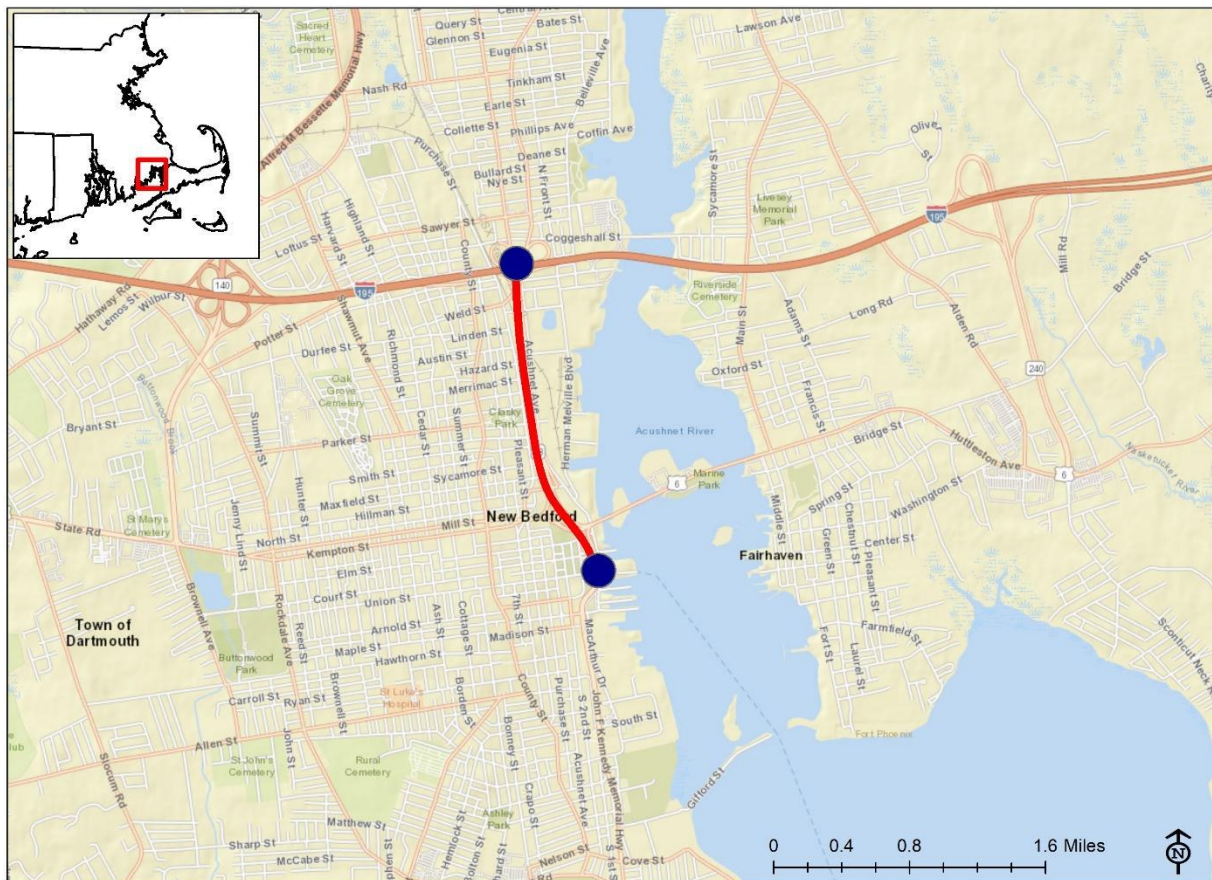
Map created by the Urban Harbors Institute, UMass Boston
With data from MassGIS, July, 2021

Figure 7: New Bedford MA to Steamship Authority in Woods Hole Map

Table 17: New Bedford MA to Steamship Authority in Woods Hole Road Segment Details

Road	Miles
I-195	14.7
25E	10
28S	0.8
28S	4
28S	9.6
28S	0.3
Woods Hole Road	3.3
Water Street	0.085038
Luscombe Ave.	0.060985
Total Miles	42.846

Freight trucks travelling from the intersection between I-195 and MA-18S to New Bedford State Pier took MA-18 S to State Pier (Figure 5 and Table 7).



**Route Map: New Bedford, MA to
New Bedford State Pier**

Map created by the Urban Harbors Institute, UMass Boston
With data from MassGIS, July, 2021

Figure 8: I-195 to New Bedford State Pier Map

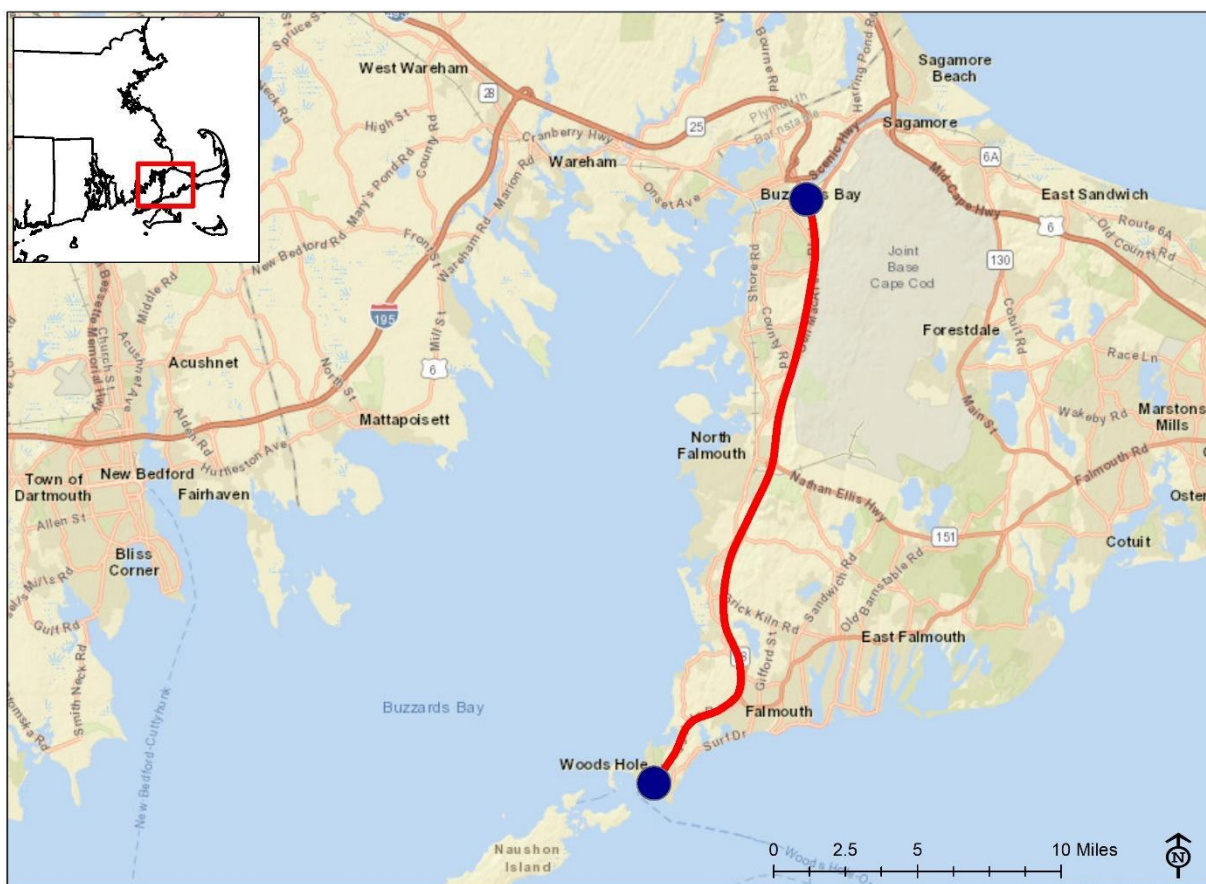
Table 18: I-195 to New Bedford State Pier Road Segment Details

Road	Miles
MA-18 S	1.7

Martha's Vineyard and Cape Cod Origin

Freight originating on Martha's Vineyard is distributed widely on- and off-Cape and likely consists of produce, landscape supplies, and other freight. We were unable to obtain specific information about the destination of these trucks carrying freight that originates on-Island. Therefore, we assume trucks originating on Martha's Vineyard would travel to the Bourne rotary, and disperse from the bridge. Similarly, we assume trucks originating on Cape Cod would travel from the Bourne rotary to Woods Hole.

We utilized the route between Bourne and Woods Hole to calculate emissions for both the Martha's Vineyard and Cape Cod origin trips, as exact starting points and destinations for these trucks are not known.



Route Map: Bourne, MA to Steamship Authority Terminal in Woods Hole, MA

Map created by the Urban Harbors Institute, UMass Boston
With data from MassGIS, July, 2021

Figure 9: Cape Cod Route to Woods Hole from the Bourne Bridge Rotary

Table 19: Cape Cod to Woods Hole Road Segment Details

Road	Miles
MA-28 S	4
MA-28 S	9.6
MA-28 S	0.3
Woods Hole Road	3.3
Crane Street	0.056629
Cowdry Road	0.070833
Total Miles	17.327

Truck Emissions for 2019 Existing Conditions and Scenario Conditions

We calculated the truck emissions for the 2019 “Existing Conditions” and “Scenario Conditions” to determine the change in truck emissions if a New Bedford ferry service was implemented. For truck emissions, we utilized 2015 emissions data from the Federal Highway Administration for single-unit and combination trucks.¹⁰⁸

Based on data provided by the Steamship Authority about the number of trucks, by size, travelling on its vessels in 2019, the number of trucks between 20 and 35 feet in length is nearly equal to that of trucks 35-feet and greater

Table 20: Emissions Data for Freight Trucks

Truck Type	Emission Type	Amount of Emissions (grams/mile)
Combination Trucks	NOx	9.02
	PM10	0.367
	VOC	0.862
	CO ₂	1,879.40
Single-Unit Trucks	NOx	4.09
	PM10	0.211
	VOC	0.88
	CO ₂	1,133.30

Existing Conditions

The number of commercial trucks carried by SSA ferries between its Woods Hole terminal and Martha’s Vineyard is the basis for estimating the existing contribution of these vehicles to traffic volumes on roadways leading to the Woods Hole terminal and on emissions. Monthly data on the number of trucks carried by the SSA to and from Martha’s Vineyard for the years 2018, 2019, and 2020 along with an explanation of how it counts commercial trucks was obtained directly from the SSA. Data on trucks

¹⁰⁸ Federal Highway Administration. 2016. Freight Quick Facts Report. Online at: <https://ops.fhwa.dot.gov/publications/fhwahop16083/ch2.htm>.

carried are also contained in the Authority's annual reports¹⁰⁹, in a summary of monthly traffic statistics compiled for the years 1996 to present¹¹⁰, and in the SSA's Vessel Capacity Report for calendar year 2019.¹¹¹ The Steamship Authority's Vessel Capacity Report provides information on the number and sizes of trucks carried on each vessel traveling between Woods Hole and Martha's Vineyard each day of the year. It also provides the vehicle capacity of each vessel and amount and percent of capacity occupied. This is the only source of data with sufficient granularity to reveal the pattern of truck trips over the course of a day, a week, or a season.

The SSA from Woods Hole reports the number of freight trucks carried on one-way trips between Woods Hole and Martha's Vineyard during the past three years is¹¹²:

- 2018 - 53,449 trucks
- **2019 - 53,366 trucks**
- 2020 - 47,999 trucks

The Steamship Authority also tracks vehicles by rough size categories equating to the number of parking spaces they require on the vessel. For 2019, there was a nearly even split between 2-space trucks (trucks 20 - 34 feet long) and three-, four-, and five-space trucks (35 – 65+ feet). These space classifications can be used to estimate the number of single-unit (2-space) and combination (3-space and greater) trucks carried via ferry. For purposes of our calculation, we estimated that 50% of all trucks were single-unit trucks, and 50% were combination trucks.

Further, using the data presented in Table 3, we calculated approximations of the number of trucks that would pass through each intercept point, as shown in Table 11.

Table 21: Number of Trucks by Origin/Intercept Point

Intercept Point	Total Number of One-Way Truck Trips (2019)
Wareham	20,389
New Bedford	20,952
Cape Cod	2,893
Martha's Vineyard	9,132
Total	53,366

Scenario Conditions

To illustrate the emissions generated from a freight ferry service from New Bedford, we postulated a ferry schedule which reflects expert opinion and data on the number of trucks traveling at different times of year. We made the following assumptions in developing the ferry schedule:

- Nearly all freight trucks with an intercept point of New Bedford (I-195) would utilize the new ferry service

¹⁰⁹ Woods Hole, Martha's Vineyard and Nantucket Steamship Authority 2019 Annual Report. https://www-steamship-assets.s3.amazonaws.com/versioned_downloadable_forms/path/ssa2875_annual_report_2019_web.pdf

¹¹⁰ Woods Hole, Martha's Vineyard and Nantucket Steamship Authority Traffic Report 1996-2021. https://www-steamship-assets.s3.amazonaws.com/versioned_downloadable_forms/path/may_2021_monthly_traffic_statistics.pdf

¹¹¹ Steamship Authority, 2019 Occupied Capacity Report (in Excel format), <https://smarcitizenstaskforce.org>, accessed February 2021.

¹¹² Steamship Authority. 2018-2020. Personal communication with Sean Driscoll, July 3, 2021.

Primarily due to the close proximity of the New Bedford State Pier to I-195, compared to Woods Hole

- Most freight trucks with an intercept point of Wareham would still utilize the normal Woods Hole ferry service, with a few trucks utilizing the New Bedford ferry service

The number of miles a truck would travel from Wareham to the New Bedford State Pier is less than traveling from Wareham to Woods Hole, but the amount of time on a ferry from New Bedford to/from Martha's Vineyard (2.5 hours) is long compared to the Woods Hole to/from Martha's Vineyard trip (75 minutes). We assume a small number of trucks may be interested in using the new service to avoid traffic crossing the Cape Cod bridges, pending space available on boats

- All freight trucks originating on Martha's Vineyard and Cape Cod would continue to utilize the Woods Hole ferry service

A freight ferry service out of the New Bedford State Pier is a long distance from Cape Cod and Martha's Vineyard, and we assume these freight trucks would not want to drive an additional distance to use the new service

- Each freight vessel could carry up to 16 trucks (eight single-unit trucks, and eight combination trucks) one-way between the New Bedford State Pier and Vineyard Haven

Three roundtrip vessel trips per day could carry up to 96 trucks/day to and from Vineyard Haven

Utilizing these assumptions, the data indicate that 1 - 3 roundtrip ferries from New Bedford State Pier to Martha's Vineyard could be offered daily depending on the season and day of the week. Because more trucks generally travel to/from Martha's Vineyard during the summer and winter weekdays compared to summer and winter weekends (Table 10), the example schedule provides for more ferry trips to/from New Bedford to Martha's Vineyard during the summer and winter weekdays.

Example Ferry Schedule Between New Bedford State Pier and Vineyard Haven, Martha's Vineyard

Summer Weekday: (Monday – Thursday, May 17 – September 13)

72 days

AM - Trip 1

- Depart NB 5:30AM - Arrive MV by 7:30
- Depart MV 8:00AM - Arrive NB 10:00

Midday - Trip 2

- Depart NB 11AM - Arrive MV 1:00PM
- Depart MV 1:30PM - Arrive NB 3:30

PM - Trip 3

- Depart NB 4:00PM - Arrive MV 6:00
- Depart MV 6:00PM - Arrive NB 8:00

Summer Weekend: (Friday – Sunday, May 17 – September 13)

54 days

AM - Trip 1

- Depart NB 5:30AM - Arrive MV by 7:30
- Depart MV 8:00AM - Arrive NB 10:00

Winter Weekday: (Monday – Thursday, January 1 – May 16; September 14 – December 31)

137 days

AM - Trip 1

- Depart NB 5:30AM - Arrive MV by 7:30

- Depart MV 8:00AM - Arrive NB 10:00
- Midday - Trip 2
- Depart NB 11AM - Arrive MV 1:00PM
 - Depart MV 1:30PM - Arrive NB 3:30
- PM - Trip 3
- Depart NB 4:00PM - Arrive MV 6:00
 - Depart MV 6:00PM - Arrive NB 8:00

Winter Weekend: (Only Saturday, January 1 – May 16; September 14 – December 31)
102 days

- AM - Trip 1
- Depart NB 5:30AM - Arrive MV by 7:30
 - Depart MV 8:00AM - Arrive NB 10:00

Given the above schedule, Table 12 contains a breakdown of trucks for the scenario conditions involving an additional ferry service departing from New Bedford (compared to existing conditions in Table 11).

Table 22: Scenario Conditions - Number of trucks utilizing the specified routes to travel to/from Woods Hole Ferry or the New Bedford State Pier Ferry

Route	Total Number of One-Way Truck Trips (2019)
Wareham – Woods Hole	17,087
New Bedford – Woods Hole	830
Bourne – Woods Hole (origin Martha's Vineyard)	9,131
Bourne – Woods Hole (origin Cape Cod)	2,893
Wareham – New Bedford State Pier	3,302
New Bedford – New Bedford State Pier	20,122
Total	53,365

Results

The results of our analyses are presented as:

1. Modelled truck emissions under existing (2019) conditions and scenario conditions
2. Modelled vessel emissions under existing (2019) conditions and scenario conditions
3. Modelled total emissions under existing (2019) conditions and scenario conditions
4. Difference in total emissions under existing (2019) and scenario conditions

Truck Emissions

Since we could not determine the origin of each truck, the emissions calculations are for the portion of the truck trip between the intercept point and the mainland port. So, while the emissions for the total truck trip is not known, this method does permit an equitable comparison of truck emissions between existing conditions and the scenario.

Based on our calculations, we anticipate the creation of a new freight ferry service from New Bedford could reduce *truck* emissions by approximately 48%. Under the scenario conditions, approximately

23,000 trucks would utilize the new ferry service from New Bedford, and 30,000 would continue to use the existing Woods Hole ferry service. Note: These estimates are based on truck transit data from 2019, and may change in future years.

Table 23: Estimated Truck Emissions (in kilograms) for Existing Conditions and Scenario Conditions

Emission Type	Existing Conditions Emissions	Scenario Conditions Emissions
NOx (kg)	11,009	5,324
PM10 (kg)	485	235
VOC (kg)	1,463	707
CO ₂ (kg)	2,529,961	1,223,469

Vessel Emissions

Using the estimate that 16 freight trucks (eight single-unit and eight combination trucks) could fit on a standard 220-foot supply vessel, approximately 3,336 vessel trips would be needed to move 53,366 trucks between Woods Hole and Martha's Vineyard. In total, the emissions generated by the vessel activity would result in 2,523,017 kg of CO₂. Emissions for NO_x would vary based on engine type and would range from approximately 92,767 kg to 9,822 kg.

Table 24: Estimated Vessel Emissions (in kilograms) Based on 2019 Conditions

Woods Hole Route -- Existing (2019) Conditions -- 3,336 trips/year						
Regulation	NOX limit (g/kWh)	KW (3800 HP Engine) 77%	Transit time	Gal/Hr	NO_x emission (kg)	CO₂ (kg)
Tier I	17	2181 kw	0.75 Hours	100	92,766.65	2,523,016.80
Tier II	14.4	2181 kw	0.75 Hours	100	78,578.81	2,523,016.80
Tier III	3.4	2181 kw	0.75 Hours	100	18,553.33	2,523,016.80
Tier IV	1.8	2181 kw	0.75 Hours	100	9,822.35	2,523,016.80

Under a scenario in which approximately three round-trips are made out of New Bedford each day¹¹³, 1,464 one-way vessel trips would occur per year to and from that port, and 1,872 one-way vessel trips would continue to operate out of Woods Hole in order to meet demand (based on 2019 freight truck numbers). Estimated NO_x emissions would vary based on engine type and would range from approximately 187,758 kg to 19,880 kg. Estimated CO₂ emissions would total approximately 5,106,538 kg.

Table 25: Estimated Vessel Emissions under Scenario Conditions by Port

Scenario Conditions: New Bedford Route -- 1464 trips/year						
Engine Type	NOX limit (g/kWh)	KW (3800 HP Engine) 77%	Transit time	Gal/Hr	NOX emission (kg)	CO2 (kg)
Tier I	17	2181 kw	2.5 Hours	100	135,701.82	3,690,744.00
Tier II	14.4	2181 kw	2.5 Hours	100	114,947.42	3,690,744.00

¹¹³ As noted in the schedule above, winter demand would not necessitate three trips/day for the duration of the winter, thus the number of trips is slightly lower than if three round-trips operated every day.

Tier III	3.4	2181 kw	2.5 Hours	100	27,140.36	3,690,744.00
Tier IV	1.8	2181 kw	2.5 Hours	100	14,368.43	3,690,744.00
Scenario Conditions: Woods Hole Route -- 1872 trips/year						
Engine Type	NOX limit	KW (3800 HP Engine) 77%	Transit time	Gal/Hr	NOX emission (kg)	CO2 (kg)
Tier I	17	2181 kw	0.75 Hours	100	52,056.11	1,415,793.60
Tier II	14.4	2181 kw	0.75 Hours	100	44,094.59	1,415,793.60
Tier III	3.4	2181 kw	0.75 Hours	100	10,411.22	1,415,793.60
Tier IV	1.8	2181 kw	0.75 Hours	100	5,511.82	1,415,793.60

Table 26: Total Estimated Vessel Emissions under Scenario Conditions

Engine Type	NOX emission (kg)	CO2 (kg)
Tier I	187,758	5,106,538
Tier II	159,042	5,106,538
Tier III	37,552	5,106,538
Tier IV	19,880	5,106,538

Total Emissions

When considering the combined vessel and truck emissions produced in the shipment of non-bulk freight between Martha's Vineyard and mainland Massachusetts in 2019, shipment of all freight through Woods Hole generated nearly 80% as much NO_x and CO₂ as would be emitted under scenario conditions.

Table 27: Combined Truck and Vessel Emissions under Modelled Existing (2019) Conditions

Engine Type	NO _x emission (kg)	CO ₂ (kg)
Tier I	103,775.97	5,052,977.78
Tier II	89,588.13	5,052,977.78
Tier III	29,562.65	5,052,977.78
Tier IV	20,831.67	5,052,977.78

Table 28: Combined Truck and Vessel Emissions under Modelled Scenario Conditions

Engine Type	NO _x emission (kg)	CO ₂ (kg)
Tier I	193,082	6,330,007
Tier II	164,366	6,330,007
Tier III	42,876	6,330,007
Tier IV	25,204	6,330,007

CONCLUSIONS

This report estimated the emissions generated from the shipping non-bulk freight between Martha's Vineyard and mainland Massachusetts in 2019 under (1) existing conditions, *i.e.*, all freight passes through Woods Hole, and (2) scenario conditions *i.e.*, almost half of all freight leaves through New Bedford on vessels departing the City roughly three times each day, year-round, while the remaining freight is transported via the terminal at Woods Hole.

Results indicate that a shift to scenario conditions, as modeled in this report, would generate additional NO_x and CO₂ emissions.

Several important caveats are needed to accurately interpret the results of this analysis:

5. Origin and destination points for freight trucks were not available, therefore truck routes were categorized based on likely intercept points, and emissions calculations were estimated from those intercept points. As a result, the truck emissions presented in this paper underestimate truck emissions.
 6. Freight trucks are carried on a variety of Steamship Authority vessels, including those not dedicated to freight. However, for purposes of this analysis, all trucks were transported via a standard 220-foot supply vessel with an average capacity of 16 trucks, allowing emissions to be compared across existing and scenario conditions. For this reason, the "current (2019) condition" vessel emissions are an estimate of emissions and should not be interpreted as actual emissions.
 7. Emissions calculations were based on current shipping practices, and do not take into consideration such things as strategies to reduce the overall number of freight trucks (*e.g.*, through freight consolidation) or emissions related to different types of vessels.
 8. The City of New Bedford has not expressed to the report's authors a specific interest in a freight ferry service. Therefore, while the New Bedford State Pier was used in the scenario presented, this does not mean that the City has endorsed a freight ferry service.
-