



January 13, 2016

Lisa Berry Engler  
Boston Harbor Regional Coordinator  
Office of Coastal Zone Management  
251 Causeway Street, Ste 800  
Boston, MA 02114-2136

Re: Boundary Review of the Chelsea Creek Designated Port Area, Chelsea, MA

Dear Ms. Engler,

Thank you for the opportunity to comment on the Boundary Review of the Chelsea Creek Designated Port Area (DPA). We do not support changes to the DPA regulations that may jeopardize the water-dependent industries within Boston Harbor.

As an increasing percentage of Boston's waterfront is converted to residential and commercial development, such areas appropriate for water-dependent industrial uses are becoming increasingly rare. Therefore, TBHA agrees with the regulation language that the "industrialized coast be preserved to the maximum extent practicable in order to meet the long term, cumulative space needs of the water-dependent industries" (301 CMR 25).

Designated Port Areas (DPAs) ensure that water-dependent industrial uses are encouraged in areas that contain three essential components:

- Waterways and developed waterfronts (especially those with deep enough channels to support larger vessels),
- Backlands (the land situated behind these waterways and waterfronts) of supporting industrial facilities and operations, and
- Transportation and public utilities appropriate to service industrial operations.

We commend Coastal Zone Management for recognizing the vital role Chelsea Creek plays as the region's energy source. The CZM boundary review states that certain portions of the Chelsea Creek DPA are currently underutilized, others have not supported water-dependent industrial uses for many years, and still others lie vacant. As previously stated, The Boston Harbor Association only supports modifications to DPAs that improve and increase the viability of Boston's working port.

After a careful reading of the report, we note that while the systematic boundary review of each generalized parcel seems appropriate, we fear any new precedents this review may set for future DPA boundary reviews and the consequential potential impacts on the remaining water-dependent industrial uses. Our comments follow.

In general, we hoped the review would have included some topographic and photographic material regarding the shoreline and property development of the proposed boundary change areas to support terms like *undeveloped, tidal flats, marshland and coastal resource areas*. Verification of the terms and findings included in the review would require cross-research or a field visit and would prove not only time consuming but also difficult for the reviewing public.

#### Railroad South

The Railroad South planning unit is undeveloped and does not include piers, wharves, bulkheads or riprap. According to the report, this section of the shoreline includes shallow waters as well as sensitive coastal resources. We note that this particular site is closest to the turning basin and likely be needed as an energy shipping channel as long as the tank fields remain in use. For this reason, future residential development on this site must not undermine existing shipping and industrial uses. We are concerned about the safety of encouraging small recreational vessels such as sailboats or kayaks around large commercial vessels especially with the intense use and disturbance of the narrow waterways as ships turn along the channel.

#### Railroad North

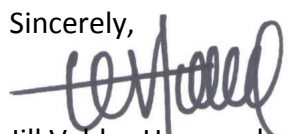
The Railroad North shoreline and bulkhead have shoaled to the point where use of the shoreline for water-dependent industrial use would require significant dredging. We expect that any additional dredging would not only incur an unnecessary expense for the city but also an unwanted impact to natural resource areas, specifically the nearby salt marsh. The North site is less immediate to the waterfront but, like Railroad South, issues relating to recreational boating and possible industrial noise and smells might be of particular concern in the future.

#### Climate Change Preparedness

Historically, the upper Chelsea Creek was connected by a vast tidal marsh and small channels to Belle Isle Marsh near Winthrop and to the Atlantic Ocean at Revere Beach through, what is now, the low-lying filled land around Suffolk Downs. With projected sea level rise of 1-2 feet by 2050 and 3-6 feet by 2100, the probability of incurring severe damage from storms (as well as flooding during astronomical high tides and at some point during normal high tides) will only continue to increase in the coming century. Our concern is the extent to which future DPAs will need to retreat inland as sea levels rise in order to maintain viable maritime activities. Although a seemingly distant concern, when regional planning begins these sites may become increasingly significant.

In closing, because DPAs are specifically designed to prevent further depletion of the waterfront resources essential to the working port, TBHA is very reluctant to support any de-designation that would undermine water-dependent maritime activities.

Sincerely,



Jill Valdes Horwood  
Waterfront Policy Analyst



Julie Wormser  
Executive Director