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March 10, 2017

Via email: ben.lynch@massmail.state.ma.us

Ben Lynch MassDEP Waterways Regulation Program One Winter Street, 5<sup>th</sup> Floor Boston, MA 02108

Re: Neponset River Greenway Segment 3, Waterways License Application No.17-4857

Dear Mr. Lynch,

Thank you for the opportunity to comment on the Chapter 91 License Application for the Neponset River Greenway Segment 3 project. We are strongly in support of this initiative.

## **Project Description**

For decades, the Neponset River Greenway Council, Boston Natural Areas Network, and local residents have advocated for a revitalized Neponset River corridor with a continuous pedestrian and bicycle system.

This Waterways License application is for a 1,400-foot extension of Department of Conservation and Recreation's (DCR) existing Neponset River Greenway trail, including a new 1,000-foot long, 10-foot wide multi-use pathway and a 400-foot long elevated boardwalk across a salt marsh in Dorchester Bay. When it is completed, this section will link the existing Lower Neponset River Trail at Tenean Beach with the Harborwalk at UMass Boston.

A section of this proposed project is located in formerly filled tidelands seaward of the historic high water mark and therefore subject to Chapter 91. In accordance with Chapter 91 requirements, the project is water-dependent, will not run through an existing public boat landings, does not propose interference with fishing and fowling rights, and will promote the public's free passage along the waterfront.

## **Public Access & Management**

We understand this is a short segment of a much larger pathway system. We ask that whenever possible, the path include public amenities like wayfinding signage, interpretive panels, benches, lighting structures, trash receptacles, mutt-mitt stations, bike racks and other public amenities.

As presented in the license application, DCR will be responsible for the long-term management of the project site. We ask that a Special Condition be included requiring an Annual Operations and Maintenance Plan to be submitted for approval by the Department. As longtime advocates of the Boston Harborwalk and free public access to the waterfront, Boston Harbor Now would be glad to work with DCR to ensure the pathway provides the access and amenities the public has come to expect of waterfront walkways.

## **Boardwalk Construction & Climate Resilient Design**

The proposed project is located within the FEMA Zone VE with a base flood elevation of 14 feet (NAVD 88).

Section 4 of the Waterways License Application includes three route and elevation alternatives for the proposed elevated boardwalk. The proponent's preferred alternative minimizes the sections exposed to wave loading and provides the greatest clearance, i.e., approximately eight feet above current high tide, well above expected coastal flood levels during the lifespan of this project. (Climate Ready Boston projects 4 – 8 inches of sea level rise by 2030, up to 1.5 feet by 2050 and 2.4 to 7.4 feet by 2100. With maximum Boston Harbor storm surges of approximately six feet, we believe that the boardwalk will need to be rebuilt long before sea level rise affects its performance.)

We look forward to the completion of this project and thank DEP for the opportunity to comment.

Julie Wormser

**VP Policy & Planning** 

Iill Valdes Horwood

**Director of Waterfront Policy**