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August 8, 2018

Boston City Councilor Matt O'Malley
Chair, Committee on Environment, Sustainability, and Parks
Boston City Council
One City Hall Square, 5th Floor
Boston, MA 02201

Re: Docket #1096, An Ordinance Protecting Local Wetlands and Promoting Climate Change Adaptation in the City of Boston

Dear Chair O'Malley,

Thank you for the opportunity to submit testimony regarding the proposed draft Local Wetlands Ordinance offered by Councilor Wu.

Boston Harbor Now is a non-profit organization focused on maximizing the benefits of Boston Harbor for everyone through quality programming, policy, planning, and design. We are committed to a vision of a future Boston Harbor waterfront that is prepared for and resilient to climate change and work collaboratively to realize this vision.

To date, the standards defined by existing building codes, zoning codes, and other development policies and regulations have been reactive. When an event occurs, regulations are updated to address the situation with the assumption that a similar event will occur and the impacts would otherwise be the same. This approach assumes that environmental conditions are static and that creating regulations based on past frequency and severity of those conditions is sufficient.

Climate change is expected to increase rates of sea level rise resulting in the loss of wetland area through what is often referred to as "coastal squeeze" particularly in areas surrounded by urbanized uplands, such as Boston Harbor. The loss of wetland area due to coastal squeeze leads to the loss of all its ecosystem benefits including essential habitat and the capacity to buffer inland development from the impacts of storms.

We agree with the Council that the current wetland regulatory framework needs to be improved, most notably through the adoption of local wetland ordinances. To play a more dynamic role in climate change mitigation and adaptation, the significance of wetlands must first be understood,

assessed, and incorporated as part of a wide-scale and comprehensive solution to climate change. This effort should be carried out in conjunction with the City of Boston Conservation Commissioners and the Environment Department.

In the face of anticipated climate change, it is crucial that we develop a framework for assessing the threat to wetlands posed by climate change in order to develop a response that also takes into account the City's resiliency priorities. No single action or measure will be sufficient to reduce the impact of climate change.

In order to protect the health, safety, and general welfare of our citizens, proposed climate change regulations must be proactive, and tailored to address future climatic conditions. Before moving forward with the proposed ordinance, it is important to recognize that:

1. The City of Boston needs more coordinated planning, policies, and investment not yet contemplated by our current waterfront regulations.
2. Existing regulations, with few exceptions, focus on parcel-by-parcel actions to the detriment of broader regional climate change solutions.
3. There are a variety of existing uses along the waterfront. In the case of water-dependent activities that require immediate access to the Harbor, —like working port activities and public access via the Harborwalk we must explore alternate solutions that maintain access while also protecting development inland; and
4. Addressing climate change through regulatory actions, especially to protect against coastal flooding, will require collective actions across multiple public and private ownership as well as city and state boundaries.

Climate change is a problem that numerous agencies can and must address. Undoubtedly, wetlands play an important role in moderating the pace of climate change and in protecting communities from the impacts of a changing climate with rising seas and increasingly severe and frequent storms.

The proposed ordinance is a noteworthy step towards advancing the conversation and commitment to the resiliency of our coastal city. We have provided detailed comments on the proposed draft directly to Councilor Wu's policy fellow.

We support efforts to improve regulations to equip Boston with the tools it needs to adequately prepare and address the climate issues our City and its communities are facing. We know the current regulatory framework needs adjustment and we hope to work with the City to help institutionalize actions that decrease the risk of harm from coastal flooding in the communities surrounding Boston Harbor.

Thank you.



Jill Valdes Horwood
Director of Policy