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March 18, 2019

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: An Ordinance Protecting Local Wetlands and Promoting Climate Change  
Adaptation in the City of Boston

Dear Chair O'Malley,

Good afternoon, my name is Jill Valdes Horwood, I am the Director of Policy for Boston Harbor Now a non-profit 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 to work collaboratively to realize this vision.

I want to thank Committee Chair O'Malley and fellow members of the Council for the opportunity to speak to you today about the proposed draft Local Wetlands Ordinance offered by Councilor Wu.

To date, standards outlined by existing building codes, zoning codes, and related policies and regulations have been reactive to coastal storm events. It is only after a storm event that these are updated and often under the assumption that future events will be similar in magnitude and impact. This approach assumes that environmental conditions are static.

Last fall numerous reports, including a study from the IPCC, appear to indicate that climate change is occurring at a more rapid rate than prior studies had anticipated. We also know that increased rates of sea level rise result in the loss of wetland areas through what is often referred to as "coastal squeeze" particularly in areas surrounded by urbanized uplands, such as Boston Harbor.

The loss of wetland areas leads to the loss of all its ecosystem benefits including essential habitat and the capacity to buffer inland development from the impacts of storms. Natural

wetlands in coastal areas absorb floodwaters by acting as a natural sponge. They have the ability to lower overall flood heights and protect people, property, and infrastructure, from devastating flood damages.

We agree with the Council that the current wetland regulatory framework needs improvement. In the face of anticipated climate change, it is crucial that we advance a framework for assessing the threat to wetlands posed by climate change in order to develop a response that also considers the City's resiliency priorities.

As a key ally, Boston Harbor Now supports 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. As the ordinance proceeds, we would like to emphasize the following:

1. Stronger efforts to engage and coordinate ongoing climate planning and policy initiatives, especially with the Boston Planning and Development Agency, the City's Environment Department, Parks Department, and the Water and Sewer Commission,
2. Language that advances and does not prevent or overburden resiliency plans and projects,
3. Focus on broader climate adaptation strategies that go beyond the existing parcel-by-parcel approach, and
4. Special consideration of the variety of existing uses along Boston's waterfront. Especially in the case of water-dependent activities that require immediate access to the Harbor, —we must explore solutions that maintain public access while also protecting development inland; and

We support and applaud the Committee for its initiative and this important initial step. Now is the time to continue to advance this effort even further. Boston Harbor Now, along with those in this room, and many who could not be here to testify welcome the opportunity to work together toward our mutual goal of protecting and preparing our city for a future that will continue to thrive and adapt to the effects of climate change.

Thank you for your time this afternoon.



Jill Valdes Horwood  
Director of Policy