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July 8, 2022

Via email: kathryn.glenn@mass.gov

Ms. Kathryn Glenn
Office of Coastal Zone Management
251 Causeway Street, Suite 800
Boston MA, 02114

Re: Designation Report for the Chelsea Creek Designated Port Area Boundary

Dear Ms. Glenn,

Boston Harbor Now respectfully submits the following comments on the *Designation Report for the Chelsea Creek Designated Port Area Boundary* prepared by the Massachusetts Office of Coastal Zone Management (CZM). Our organization has been following this project since its inception and has previously submitted comments on its development in an October 2021 letter to CZM. We also attended the most recent hearing on June 14th, 2022.

Boston Harbor Now strongly supports active maritime uses around the waterfront, and we believe that the future of the working ports around Boston and the Commonwealth depends on a fresh look at where waterfront areas can be consolidated to serve future maritime uses while also identifying non-functioning fragments that need to be reimaged to address climate change and/or equitable waterfront access. Where Designated Port Area (DPA) land is no longer suitable for marine industrial uses, we hope that it is repurposed in a way that will serve to benefit East Boston residents, address coastal flood risks, encourage access to the waterfront, and support economic growth.

Further south, the East Boston DPA is fragmented in ways that make many working waterfront uses challenging between residential parcels and with limited landside access. Meanwhile, the Chelsea DPA remains largely intact, and we are concerned the fragmentation of this area will subject more of the DPA to gradual shrinkage as redevelopment pressures hem it in and make it vulnerable to further degradation rather than effective land banking.

Removals from the DPA

We agree with CZM's analysis that the Central Unit may be removed from the Designated Port Area (DPA) in accordance with the four metrics outlined by 301 CMR 25.04(2). As noted by CZM, this area fails to meet the criteria (a) of 301 CMR 25.04(2), which states that the land must include or be contiguous with a shoreline that has been substantially developed with piers, wharves, bulkheads, or other structures that establish a functional connection with a water. In addition to the lack of functional



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connection with the water caused by the MBTA owned at-grade railroad right of way, we find that this area lacks a substantially developed shoreline. This area does not contain wharfs, piers or other substantial infrastructure that would allow water access, which is required for a functional connection to the water. Although it does meet the remaining three criteria, the lack of water access makes this site not well suited for marine industrial uses. However, if any part of the study area is to be used for future maritime uses, whether for renewable energy production like the shipping and storage of wind turbines or another yet-to-be developed use that requires shoreline access and adjacent back land, then the removal of this parcel further limits the potential for the DPA to thrive along the Chelsea Creek.

Boston Harbor Now recognizes that DPA designations protect facilities that are a scarce and non-renewable resource. We have also observed that where these properties do not have sufficient infrastructure to support the marine industrial uses, the designation leads to vacant or underutilized parcels that lack the economic incentives to be redeveloped for climate adaptation and flood protection purposes as well as other economically sustainable uses. Removing a single unit from the DPA will not solve the district wide coastal storm flooding problems this area is expected to see. In other words, CZM should determine whether the entire study area should be de-designated or remain whole. Without broader financial support or comprehensive planning, these properties are being land banked without compensation or a broader vision for future uses thereby putting the area at risk of flooding as well as economic instability.

Future Development in the Central Unit and on the East Side of Chelsea Creek

Should the Central Unit be removed from the DPA, we specifically hope that future development coming into the Central Unit can contribute to furthering the community goals identified in *Vision Chelsea Creek* and can protect the neighborhood from incoming coastal storm flooding. The removal of the Central Unit and any adjacent areas from the DPA would provide the opportunity to invite the community to the waterfront. Residents of the Eagle Hill, Harborview, and Brandywyne Village communities would then have the benefit of access to the waterfront. Although some residents are physically proximate to Constitution Beach, their access is somewhat limited by the Blue Line tracks and their access to Chelsea Creek has been historically restricted by marine industrial uses. A new connection to the waterfront would be highly beneficial given the limited access currently provided. Therefore, it is essential that future development in areas removed from the DPA should provide a new Harborwalk facility and other Chapter 91 amenities that embody the principles of Harborwalk 2.0 along the waterfront—increased accessibility, resilience, and equity. Given the Central Unit's centrality in a major flood pathway identified by Coastal Resilience Solutions for East Boston and Charlestown (Phase II) and East Boston's status as an environmental justice community, future development here should provide and be linked to a continuous waterline defense to protect itself and the rest of the neighborhood from flooding.

We understand that this area is presently industrial in nature and will likely remain so even if it is removed from the DPA. However, it will be important that Chapter 91



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regulations, requiring non-water dependent uses to provide public amenities, still be enforced. Even though this area is not conducive to visitation at the moment, the Central Unit and adjacent areas have potential to provide the neighborhood the amenities recommended by the Vision Chelsea Creek process and plan, which includes, access and view corridors across the industrial edge, increased waterfront public access and space that better connects the community and its businesses to maritime assets and the creek. The community has also identified a desire for community space and a greenway running along the edge of Chelsea Creek. In much the same way that the Harborwalk emerged from an initially piecemeal implementation downtown and elsewhere, the Chapter 91 process will hopefully lead to the implementation of these changes and effectively carve out a space along the Chelsea Creek as effectively as the “Publicly Organized Recreation Territory” (PORT park) on the western side of the DPA.

We appreciate the opportunity to comment and will continue to remain engaged in the Chelsea Creek DPA review, and other DPA reviews in East Boston and the region. We hope to see additional planning by City and State agencies that can guide development and climate adaptation in these areas as well as broader conversations about defining the roles and protections for DPAs moving forward. We would be happy to speak with you further if there are additional questions.

Sincerely,

A handwritten signature in black ink that reads "Kathy Abbott".

Kathy Abbott
President and CEO
Boston Harbor Now