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April 7, 2023

Via email: Eva.Vaughan@mass.gov

Ms. Rebecca Tepper, Secretary
Massachusetts Environmental Policy Act (MEPA) Office
100 Cambridge Street, 9th Floor
Boston, MA 02114

Attn: Eva Vaughn

Re: Island End River Flood Resilience Project Expanded Environmental Notification Form

Dear Ms. Vaughn,

Boston Harbor Now respectfully submits the following comments on the *Island End River (IER) Flood Resilience Project Expanded Environmental Notification Form* prepared by the Cities of Chelsea and Everett. Boston Harbor Now staff has been following this project and have most recently attended the March 14, 2023 MEPA Public Meeting and reviewed the Supplemental Information Packet.

As longtime stewards of the Harborwalk in and around Boston, Boston Harbor Now is committed to ensuring that the coastline changes built today are designed for a more resilient and inclusive future. We use the term “Harborwalk 2.0” to capture the aspirations of this work to ensure the waterfront is accessible and welcoming; is prepared for the coastal impacts of climate change; and centers equity and inclusion in the development of its design, construction, and programming. An accessible waterfront should have connections between the community and the water as well as numerous activation strategies to serve all residents. A resilient waterfront includes a variety of climate adaptation strategies to protect and serve Chelsea and Everett at a district scale. To center equity in waterfront design is to focus on strategies that make the waterfront feel safe and inclusive through lighting, multi-lingual signage, full ADA accommodations, and the elimination of features that make users feel unwelcome or excluded.

The IER Flood Resilience Project is an impressive collaboration between the City of Everett and City of Chelsea to build climate adaptation and flood protection measures that can meet the needs of a variety of stakeholders. We applaud the inter-municipal collaboration that generated and will fund this proposal as well as the thoughtful design considerations for future waterfront park goers, water-dependent industrial uses, and ecosystem improvements. As the proponent moves forward with their designs, we



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hope they continue to prioritize their partnership with community organizations to ensure that the stewardship program and coordinated stakeholder engagement is continued along with the advancement of nature-based approaches (NBAs) that provide flood risk reduction and other co-benefits.

Inter-Municipal Collaboration

This proposal has the unique challenge of needing to balance the needs and requirements of two different municipalities and competing land uses. Despite these complications, the project is stronger for the mixed and matched flood strategies used to address these divergent needs. Flood resilience on the Chelsea side is geared towards improving the human experience. The Chelsea side of the site is surrounded primarily by commercial uses and is home to Island End Park, a small park along the IER that affords visitors a place to relax and look out at the water. Here, NBAs and wetland enhancements are paired with resilient riverwalk amenities and finishings on the Chelsea side to create an engaging visitor experience that the public can enjoy.

The Everett waterfront is home to the New England Produce Center and other water-dependent industrial uses. This side of the project is located within a Designated Port Area (DPA), so the proposed interventions are designed around the operations of the working waterfront businesses in the DPA. The proponent has opted for concrete storm surge barrier walls with passive and active storm surge barrier gates along the whole Everett side of the site, while also installing some NBAs along a smaller portion where feasible. The Everett alignment is designed to prevent overland storm surge flooding while allowing water-dependent industrial operations to continue to function.

While the tailored strategies for each side of the site are impressive, the two municipalities' successful coordination is perhaps the most laudable aspect. Thanks to both cities' coordinated efforts, the varied adaptation strategies are properly tied together to ensure district-wide flood protection. The two cities' efforts to coordinate will also ensure that construction and phasing minimize the risk of channelization that might otherwise have occurred if the cities each proposed their own flood measures.

Community Engagement through Nature-Based Approaches

As co-leaders of the Stone Living Lab and advocates of multi-benefit coastal adaptation strategies we are encouraged to see NBAs incorporated into the



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site's flood resilience strategies. NBAs can mimic naturally occurring shorelines, help restore ecosystems, reduce flood risk, and provide a host of other co-benefits, including improved suitability for public access. We appreciate that this project leverages its NBAs to help foster community connection to the waterfront. The IER proposal references a strong partnership with MyRWA, GreenRoots, and the City of Everett's Mayor's Youth Employment Intern program. This program proposes that NBAs will provide community members with environmental education and stewardship opportunities that will empower community advocates to help implement and maintain the NBAs by contributing to planting, nest-building, and plant management. We believe this unique programmatic model fosters connections between the community and the natural environment, and we will monitor it in the hopes that it can be replicated effectively with other resilience projects.

We highlight these design elements because potential permitting challenges faced by eliminating the proposed planters and phragmites removal could jeopardize the community's involvement in this project. As described in the filing, the community's stewardship opportunity seems to hinge upon a hybrid system of planters to introduce vegetation would not survive the soils on site that have been degraded by urban uses. While alternatives have been offered to the original planter proposal, we believe the long term community engagement afforded by the inclusion of NBAs is an important benefit. We would support proposed alternatives if they were still able to ensure the community stewardship program will be able to move forward. Similarly, we see the removal of phragmites and return to native plantings as an educational opportunity for the community and best practice in ecological restoration. We would like to see both aspects of the project maintained; however, if changes are necessary during the ongoing permitting process, we hope the proponent will coordinate with their community partners to find an acceptable alternative.

We appreciate the opportunity to comment on this project and look forward to following its progress toward implementation. We would be happy to speak with you or the proponent 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