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April 7, 2023

Via email: [alexander.strysky@mass.gov](mailto:alexander.strysky@mass.gov)

MEPA Office  
Attn: Alexander Strycky  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Re: Piers Park III EENF

Dear Mr. Strycky,

Boston Harbor Now respectfully submits the following comments on the *Piers Park III Expanded Environmental Notification Form* submitted by The Trustees of Reservations. Our staff has followed this project since its inception, and most recently, we attended the remote site visit on March 27th, 2023.

As longtime stewards of the Boston Harborwalk, Boston Harbor Now is committed to ensuring that the waterfront we build today is 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 both linear and lateral connections between the city and the water, as well as numerous activation strategies to serve all Bostonians. A resilient waterfront includes a variety of climate adaptation strategies to protect and serve Boston 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, signage (preferably multi-lingual), full ADA accommodations, and the elimination of features that make users feel unwelcome or excluded.

Piers Park III is a unique and complex project that proposes converting a dilapidated pier into an immersive ecosystem that invites East Boston community members to explore the waterfront in a new way. Through its use of living shoreline elements, the park creates an engaging waterfront experience that invites the community to interact with the changing tides while restoring habitats and establishing new ones. Their community engagement efforts have been particularly extensive and set a new bar for language access and range of feedback collection modes for a private project— hosting welcoming public meetings and using community events to share updates on the park’s design. As this project progresses, we hope



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the proponent will continue exploring the anticipated effects of sea level rise on the park. This space will be a unique asset to East Boston.

### *Lessons from the Community Engagement Process*

The proponent recognized the critical need to conduct community outreach to local environmental justice populations and went above and beyond the standards traditionally set by the MEPA process. Since the beginning of the project's design, the proponent has worked to ensure that public meetings have been accessible to a broad audience by offering a variety of meeting times, locations, and languages. The proponents have regularly offered alternative meeting dates and times to have presentations and conversations conducted entirely in Spanish rather than relying on interpretation. Their community engagement efforts have also extended beyond the traditional public meeting model. The proponent has worked to meet the community where they are, and they have hosted their own events like Sabores de Nuestra Cultura Family Festival and tabled at community partner events like the East Boston Neighborhood Health Center's weekly winter and summer farmers market. Through this extensive process, the proponent has engaged over 10,000 community members from East Boston and surrounding neighborhoods, including notable participation from Roxbury and Chelsea. We appreciate this project's precedent and hope that other waterfront proponents will take lessons from this process.

### *Living Shoreline*

As a park built on a pier and adjacent to another park, this project does not have the structural potential to address future storm surge flooding or tie into district-scale flood protection elevations. However, we very much appreciate that the proponent has incorporated multiple living shoreline elements and other nature based approaches that can enhance and restore marine habitat both underwater and in the intertidal zone, adjust to rising sea levels, and provide a buffer for storms and wave action. The living shoreline features balance public interactive elements and areas that serve only to create new habitats. Oyster gabions and reef balls will be placed underwater to create fish habitat, and portions of the existing pier will be converted to bird habitats unavailable to the public but provide co-benefits of ecosystem improvements and storm energy mitigation. The intertidal features like the tide pools and salt marsh invite members of the public to explore these new ecosystems and offer opportunities for environmental education.

Although the site is designed to accommodate the changing tides and incorporates this feature into its landscaping, we are concerned that the site design may not be fully prepared for future sea level rise when mean high tides



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may be several feet higher. While some elements of the park are meant to flood, like the intertidal features, we worry other spaces may be inundated as tides rise. As the proponent moves forward with the design of this project, they will need to understand better how the park's shape will change over time and what features will be accessible with 40 inches of sea level rise. The proponent has already committed to taking steps to understand their site's future conditions better and has contracted the Woods Hole Group to develop flood modeling to predict tidal elevations based on future sea level rise. Depending on the modeling results, the proponent may want to modify their site design to ensure that features meant to remain dry do so even in the future or have a plan for further on-site adaptation and adjustments. The Woods Hole data will be invaluable to this project and other East Boston waterfront developments, and we applaud the proponent's willingness to share this research with the public.

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". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Kathy Abbott  
President and CEO  
Boston Harbor Now