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April 1, 2024

Via email:[purvi.patel@mass.gov](mailto:purvi.patel@mass.gov)

MEPA Office  
Attn: Purvi Patel  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Re: Bayswater Street Revetment Repairs and Restoration EENF

Dear Ms. Patel,

Boston Harbor Now respectfully submits the following comments on the Bayswater Street Revetment Repairs and Restoration EENF submitted by the Massachusetts Port Authority (Massport). Our organization recently attended the January 16th, 2024, Remote Consultation Session and has met with Massport about the project since filing.

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. While this project’s focus is on shoreline stabilization and does not include an existing or new Harborwalk, we still believe that the principles of Harborwalk 2.0 can be applied to this project.

*New and Existing Vegetation*

To repair the approximately 1,650 linear feet of existing embankment along Bayswater Street, Massport will remove the existing stone and vegetation from the site, regrade the slope, and replace them with a new 3.5±-foot-thick layer of armor stone and new vegetation. To minimize damage to the existing marsh, Massport will install a temporary sheet pile wall along the



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limits of the proposed repairs, which will be removed upon completion of construction.

We appreciate the Massport's protection of the adjacent marsh. Marshes provide vital ecosystem services like wave attenuation, shoreline stabilization, and storm runoff filtration. Although the slope of the embankment is too steep to accommodate marsh migration, we appreciate that Massport has made efforts to minimize construction impacts to the marsh, allowing it to continue on for the foreseeable future.

As Massport looks to replace the vegetation along Bayswater Street, we recommend they use native, salt-tolerant, and erosion-resistant plantings in accordance with CZM's Coastal Landscaping Index and StormSmart Coasts resources. Though this project is designed to accommodate the 2070 1% chance annual coastal storm and will be elevating the revetment from elevation 10-12 NAVD88 to elevation 14.5 NAVD88, we hope that the selected plantings can weather potential damage from flooding.

#### *Preserving and Enhancing Public Access*

At present, Bayswater Street has two public staircases that lead down to the marsh below. The staircases, though not well-signed, are used by the nearby community as both a place to sit and get down to the water to launch boats. When Massport replaces the revetment, we hope they will also replace these stairs that connect the community to the water. The replacement stairs should maintain space for community members to sit and enjoy the views of the water and airport, and additional signage demarcating their presence should be installed. Improvements to the stairs should be limited to what can be implemented without disrupting the marsh below. We recommend Massport reach out to the local neighborhood to determine if other desired community amenities might be feasible to incorporate.

At present, there is no Harborwalk or sidewalk along Bayswater Street. Though it may be outside this project's scope, a sidewalk on the revetment side of the street would significantly improve the visibility of the water access and stairs from the street, strengthening the connections to the water. Harborwalk along the street would further enhance the connection to the water at this site; however, we recognize that the requisite 12-foot wide pathway would be challenging to implement without substantially narrowing the road.

Even though this project's scope is focused solely on the revetment replacement, we hope the Massport will use the opportunity to enhance the



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area with new plantings and improved access to the water. We appreciate their efforts to preserve the marsh and hope they will add replacement plantings that are able to withstand coastal inundation. Stairs down to the water should be maintained, and amenities like improved signage and additional seating with views of the harbor should be incorporated into the new design of the buffer park.

We appreciate the opportunity to comment on this project and look forward to remaining engaged through future phases of design and construction. We would be happy to speak with you further if you have additional questions.

Sincerely,

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

Kathy Abbott  
President and CEO  
Boston Harbor Now