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March 27, 2025

Council on Environmental Quality
730 Jackson Place NW
Washington, DC 20503

Re: *Docket number, CEQ-2025-0002*

Boston Harbor Now is a Massachusetts-based nonprofit that envisions a vibrant, welcoming, and resilient Boston Harbor, Waterfront, and Islands for the benefit of everyone. We are a leading member of the Boston Harbor Islands National and State Park partnership.

Boston Harbor Now opposes the Council on Environmental Quality's (CEQ) proposed [interim final rule](#), which would repeal the National Environmental Policy Act (NEPA) regulations, 42 U.S.C. §§ 4321 et seq. This interim rule is an effort to comply with Executive Order 14154, [Unleashing American Energy](#), which directs CEQ to rescind the NEPA regulations and to issue nonbinding guidance for federal agency review to fast-track the development of major projects.

NEPA was enacted in 1977 to require federal agencies to assess the significant environmental impacts of major federal projects. Often referred to as the "Magna Carta" of environmental laws, NEPA serves as a critical tool for decision-making by ensuring that federal decision makers carefully consider the consequences of their actions. While it does not mandate specific outcomes, NEPA requires federal agencies to provide stakeholders with the data they need to weigh in on proposed developments, including projects that may detrimentally impact local communities. By requiring a consistent review process, NEPA ensures that decision-makers are aware of the potential consequences of projects, helping to prevent harm to human health and the environment while promoting informed, responsible development.

As a non-profit that advocates for environmental protection and resilience, we are concerned about the repeal of NEPA, and the harm it could do to the people and natural resources we work to serve. However, this interim final ruling poses risks that extend far beyond organizations like Boston Harbor Now. We want to bring to light some concerns beyond our own realm of influence that we ask you to consider.

NEPA's procedures, including environmental impact assessments, offer a crucial framework for identifying potential risks, inefficiencies, and unintended consequences of proposed actions. Without these regulations, projects might proceed without thoroughly examining long-term sustainability, local community impact, or environmental hazards. This lack of scrutiny could lead to unforeseen operational challenges, costly legal disputes, and delays if issues emerge post-construction. Additionally, without robust stakeholder engagement—a key component of NEPA's process—projects risk losing public trust and facing resistance from affected communities.

For businesses and other organizations, removing NEPA's regulations may seem like a shortcut to project approval. However, this decision could lead to long-term financial and reputational setbacks due to insufficient oversight of risks. New projects could inadvertently harm critical ecosystems, resulting in compliance



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penalties or reputational damage. Infrastructure projects could face backlash for inadequately addressing equity concerns or environmental justice. Moreover, NEPA's procedures contribute to innovation by encouraging developers to identify sustainable and efficient approaches to their projects. Without these processes, organizations might miss opportunities to improve their designs or align with emerging standards for sustainability, ultimately losing competitive advantage in an increasingly environmentally conscious marketplace. While Boston Harbor Now supports regulatory reforms and review processes that promote efficiencies, we oppose CEQ's interim final rule as it would undermine the established framework of NEPA and short-circuit the rule of law. By allowing each federal agency to implement NEPA reviews, the rule could lead to inconsistent procedures from one agency to another, creating confusion, disrupting the approval process, inviting lawsuits, and reducing the ability to make informed decisions.

In conclusion, NEPA's regulations are not mere bureaucratic hurdles; they are essential safeguards that benefit all sectors by promoting thoughtful planning, risk mitigation, and community engagement. Removing these regulations jeopardizes environmental protection and the success and credibility of future projects, like energy infrastructure. It could also create permitting confusion, ultimately slowing these projects down. Boston Harbor Now therefore opposes CEQ's interim final rule.

Thank you for your consideration of this matter.

Sincerely,

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

Kathy Abbott
President and CEO
Boston Harbor Now