



April 7, 2025

Via email: [Nicholas.Moreno@mass.gov](mailto:Nicholas.Moreno@mass.gov)

Are you on board?

15 State Street Suite 1100  
Boston, MA 02109  
617 223 8667  
[bostonharbornow.org](http://bostonharbornow.org)

**Board of Trustees**

Meaghan Hooper-Berdik  
Robert Delhome  
Grace Macomber Bird  
Kevin Clarke  
Jamie M. Fay  
Robert Gollledge  
Greg Herrema  
Ann Lagasse  
Malia Lazu  
Mary Kay Leonard  
Shelagh Mahoney  
Andrew McElwee  
James Miner  
Martin O'Neill  
Elaine Richardson  
Bud Ris  
Demetriouse Russell  
Nalini Sharma  
Cathy Douglas Stone  
Kishore Varanasi  
Richard Walker  
Betsy Wall

**Ex-Officio Members**

Katherine F. Abbott  
Michael Creasey  
Fred Laskey  
Rebecca Tepper  
Andrew Hargens

**Lifetime Trustees**

Governor Michael Dukakis  
Governor William Weld

**President & CEO**

Katherine F. Abbott

Massachusetts Environmental Policy Act Office  
100 Cambridge Street  
Boston, MA 02114  
Attn: Nicholas Moreno

Re: Revere Commerce Center Expanded Environmental Notification Form

Dear Mr. Moreno,

Boston Harbor Now respectfully submits the following comments on the *Revere Commerce Center Expanded Environmental Notification Form (EENF)* submitted by the Revere, MA Owner LLC. Our organization has reviewed the EENF and appreciates this opportunity to provide comments.

Boston Harbor Now advocates for climate resiliency measures that contribute to district-scale flood protection and improve ecosystem services while activating the waterfront by facilitating public programming, ensuring equitable access. We are a long-time champion of working waterfronts, with their unique requirements for deep water access and specialized jobs and are committed to ensuring that the waterfront we build today is designed for a more resilient and inclusive future. We hope to see Designated Port Areas (DPAs) support the existing and future marine industries that strengthen our region and are prepared for the challenges climate change will bring. We expect robust port areas to partner with their neighboring communities and provide residents with jobs, educational opportunities, and public access, where safe and appropriate.

*Potential for a Water-Dependent User*

This project proposes constructing a one-story warehousing and distribution facility with 40 loading docks, 54 passenger vehicle parking spaces, and 76 additional trailer storage spaces. Although the one-story warehousing and distribution facility is not within Chapter 91 jurisdiction, it is within the DPA. As described in the filing, the warehouse/distribution center is not a water-dependent industrial (WDI) use. It is typically expected that property owners within DPAs market their space to WDI users, and only after receiving no interest from this group are they allowed to use their space for non-water-dependent uses. The proponent has verbally informed us that they have spoken with approximately 20 WDI businesses over the past year and received no interest. As the proponent searches for a tenant, we hope they will continue to market their site to WDI businesses, as this space still has potential to cater to the WDI community. The pier on site, though difficult to access due to the rail corridor, will be retained according to the filing, allowing for future water



Are you on board?

15 State Street Suite 1100  
Boston, MA 02109  
617 223 8667  
[bostonharbornow.org](http://bostonharbornow.org)

access. If multiple businesses show interest in the site, we hope the proponent will prioritize any WDI business.

Even if the proponent cannot identify an immediate WDI user for this site, we hope they will work to ensure that the “Maritime User Area” they’ve carved out is suitable for this WDI business. The amount of space provided, 0.76 acres, or approximately 33,106 square feet, seems small, especially when there is approximately 95,125 square feet of land subject to both Chapter 91 and DPA regulations. We hope the proponent will carve out additional contiguous space for future WDI uses to ensure the space is large enough to accommodate their future operations. We also expect the proponent to maintain the pier in proper working condition. This pier should be ready to be used as soon as a WDI user is identified, and the proponent should ensure that it is prepared for and adapted to potential climate change impacts like sea level rise and storm surge. All climate adaptations for this pier should ensure that future water-dependent operations are able to fully operate at this site.

#### *Climate Resilience*

According to the EENF, the proponent plans to elevate their site to “approximately El. 11’, to set the Project Site above the current FEMA floodplain and RAMT report’s projected 2070 mean higher high water (“MHHW”) elevation (El. 9.8’).” The building will have a Finished Floor Elevation (“FFE”) elevation of 15.8’, “which will set the ground floor above the FEMA 100-year floodplain (El. 10’) as well as the projected 2070 50-year return period storm water surface elevation (El. 13.3’) and wave action water elevation (El. 14.5’)...”

We appreciate that the proponent’s flood grading efforts address 2070 coastal flooding and are consistent with the 2024 Route 1A Corridor Study, which “propose a raised shared use path for this area with a design flood elevation of El. 16’.” The shared use path is expected to expand waterfront public access and provide flood protection. According to MassDOT’s Route 1A Corridor Study “given the presence of buried liquid fuel lines and two active docks fronting the Chelsea Creek Designated Port Area along this section of the corridor, coordination with adjacent property owners would be critical in ensuring that regional flood mitigation and active transportation infrastructure enable continued access and use of the industrial waterfront.” We strongly encourage the proponent of this site to coordinate with MassDOT to ensure that this site retains access to the water and pier so WDI can operate at this site, even with the proposed shared use path.

This project will result in a net increase of approximately 8.6% in total impervious surface coverage at the site. Boston Harbor Now is concerned about the amount of impervious surface on site and its potential impacts to



Are you on board?

15 State Street Suite 1100  
Boston, MA 02109  
617 223 8667  
[bostonharbornow.org](http://bostonharbornow.org)

heat island and stormwater flooding. While we appreciate that the site proposed 1.6 acres of new landscaped area, with approximately 100 new trees, we urge the project proponent to consider additional interventions and alternatives to mitigate heat island and stormwater impacts. We ask the proponent to explore permeable and cooling pavement options to mitigate the 30+ days increase in days over 90 degrees and “high risk of Extreme Precipitation” predicted by RMAT. There is a large amount of parking affiliated with this site, and we wonder if any of that space might be converted to landscaping or some other public benefit, especially along the north side of the site.

*A Note to CZM and MassDEP*

Though portions of the site, approximately 95,125 square feet, are subject to Chapter 91, including the one-story warehousing and distribution facility, which will be sited entirely landward of Chapter 91 jurisdiction. The entire site is located within the Designated Port Area (DPA) boundary. It is our understanding that DPA regulations can only be enforced in land subject to Chapter 91, meaning only the 95,125 square feet or 22% of the site is actually subject to the DPA rules and regulations. The lack of clarity around DPA but non-Chapter 91 land is confusing, and Boston Harbor Now would like clear guidance on the expectations for this type of land. We specifically would like clarity on what land uses are allowed and expected within these spaces. Land within the DPA is zoned for WDI uses; however, Boston Harbor Now has recently seen multiple non-water-dependent uses emerge in DPAs because they are not located in Chapter 91 jurisdiction, including this project and 98-100 Condor Street in East Boston. It is unclear to us if this is in the spirit of the original intent of the DPAs, and if it is not, we would like to flag this emerging pattern to the relevant regulatory agencies, whom we hope will look further into this matter.

*In conclusion*, this project has the potential to better support WDI uses by marketing itself to and prioritizing potential WDI tenants, actively maintaining and flood proofing the pier on site, and allocating more Maritime User Area space. Although we appreciate that this site complies with the 2024 Route 1A Corridor Study, which increases public access to this portion of the Chelsea Creek, the proponent will need to coordinate closely with MassDOT to ensure WDI operations can continue here. To mitigate heat island and stormwater flooding, more landscaping could be added to the northern portion of the site, and alternative solutions like pervious surfaces and cooling pavement should be explored. Boston Harbor Now recently noticed projects have been within DPAs but outside Chapter 91 jurisdiction. In those instances, we’ve seen non-water-dependent uses proposed. We would like to better understand MassDEP and CZM’s policy on allowable and preferred land uses in these areas.



Are you on board?

15 State Street Suite 1100  
Boston, MA 02109  
617 223 8667  
[bostonharbornow.org](http://bostonharbornow.org)

We are grateful for the opportunity to comment on this project and will continue to follow its progress toward implementation. If you have additional questions, we would be happy to speak with you or the proponent.

Sincerely,

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

Kathy Abbott  
President and CEO  
Boston Harbor Now