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January 7, 2026

The Honorable Senator Paul Mark, Acting Chair
Joint Committee on Bonding, Capital Expenditures & State Assets
State House, Room 504
Boston, MA 02133

The Honorable Representative Michael Finn, Chair
Joint Committee on Bonding, Capital Expenditures & State Assets
State House, Room 39
Boston, MA 02133

RE: Support for S.2542, An Act to Build Resilience for Massachusetts Communities

Dear Acting Chair Mark, Chair Finn, and members of the Joint Committee on Bonding, Capital Expenditures & State Assets,

Boston Harbor Now ensures that Boston Harbor's waterfront and islands are accessible, inclusive, and adapted to the risks of climate change. We advocate for climate resiliency measures that contribute to district-scale flood protection and improve ecosystem services, as well as waterfront activation that welcomes everyone to the harbor and islands, especially those who have been historically excluded. We do this to realize our [Harborwalk 2.0](#) vision of a vibrant, welcoming, and resilient coastline.

We are grateful to enjoy close partnerships with the Executive Office of Energy and Environmental Affairs, Department of Conservation and Recreation, Department of Environmental Protection, Office of Coastal Zone Management, MassPort, and other state agencies, and we support increased capital investments for their important work.

We appreciate the opportunity to support of [S.2542, the Mass Ready Act](#), the passage of which will authorize state investments in equitable access to nature and parks, environmental justice, climate resilience, and much-needed permitting reforms. This bill paves the way toward more resilient communities and equitable access to our green and blue spaces, while meeting the goals outlined in state laws, goals, and plans.

Below please find Boston Harbor Now's recommended improvements to the Mass Ready Act. We will attach a copy of the legislation with red-lined edits reflecting these proposals.

Statewide Coastal Resiliency

Line Item 2000-7083

Boston Harbor Now commends the Healey-Driscoll Administration for its leadership in addressing coastal climate resilience. This item would fund vital infrastructure including nature-based climate solutions, enabling the Office of Coastal Zone Management (CZM) and the Department of Conservation and Recreation to provide grants and loans to cities, towns and nonprofit partners. These funds are critical to implement CZM's [ResilientCoasts Plan](#), which projects that coastal property damage could reach over **\$1 billion a year** by the 2070s with over 70% of the damage in the communities surrounding Boston Harbor. The full range of consequences from coastal hazards include loss of life, and damage to infrastructure, homes, businesses and ecosystem services. By proactively investing in shoreline resilience, the state can avoid the worst impacts and save money doing it. Please note that we request that "*nature-based research and demonstration projects*" be explicitly included in this line item, as highlighted in the attached red lined version of the legislation. To support these priorities, we respectfully request the Legislature to encourage major investments in this statewide priority program and increase authorization from \$200 million to **\$500 million**.

Department of Conservation and Recreation State Parks

Line item 2840-7028

The Department of Conservation and Recreation (DCR) owns and manages over 450,000 acres and provides access to outdoor recreation while conserving, restoring and stewarding state parks, forests, trails, wetlands, waterways, islands, trails, beaches, islands, infrastructure, and facilities. As a result of chronic underfunding, the state has approximately \$1 billion deferred maintenance backlog on DCR properties - funding needed to undertake capital improvements, ensure visitor safety, and enhance visitation, including to the [Boston Harbor Islands National and State Park](#). Significant new investments will enable DCR to continue its growth trajectory while simultaneously addressing the maintenance backlog. While we are grateful for the Administration's investment of \$587,375,000 for DCR State Parks, we request an additional **\$200 million** in authorization help DCR close its deferred maintenance backlog for a total of **\$787,375,000**.

Department of Conservation and Recreation Coastal and Marine Infrastructure

Line item 2800-7026

Through our legislated partnership with DCR and the National Park Service, Boston Harbor Now facilitates educational, recreational, and cultural experiences to tens of thousands of program participants every year on the Harborwalk and in the Boston Harbor Islands National and State Park. We provide access to underserved communities through reduced and free ferries and free daily community-led programming and special events. This work is deeply rewarding, as people who spend time outdoors have less mental stress, are more physically active, and have longer life spans. Unfortunately, much of the island's infrastructure is unsafe or unusable and in dire need of repair and replacement. Boston Harbor Now requests **\$40 million** additional "*for capital improvements in the Boston Harbor Islands National and State Park.*" This funding will improve the visitor centers on both Spectacle Island and George's Island; create and improve ADA access; repair and replace docks, piers, mooring fields and marinas; design and build climate-resilient infrastructure; and improve the gateways to Boston Harbor. We urge you to also include **\$12 million** for "*nature-based climate adaptation*

demonstration projects on the Boston Harbor Islands and for the statewide expansion of the [Real-Time Monitoring](#) project led by the [Stone Living Lab](#) through Boston Harbor Now” to be deployed on coastal sites throughout Massachusetts. We respectfully request the \$308,100,000 line item to be increased to **\$360,100,000**.

Department of Conservation and Recreation Parkways

Line item 2890-7036

Several DCR Parkways are imminently threatened by flooding, especially Morrissey Boulevard in Dorchester which is listed as a priority need in the Massachusetts Hazard Mitigation and Climate Change Adaptation Plan. Additional funding is also needed to create new, green water transportation options, including an alternative-fuel ferry and water taxi system. The Boston Harbor Islands National and State Park consists of 34 islands and peninsulas located within 10 miles of Greater Boston. Traditionally, seven Boston Harbor Islands were accessed by public ferries, however, today only Spectacle, Georges, and Peddocks islands offer ferry service. To help expand service, reduce the growing cost to visitors, and mitigate climate emissions, we request a \$25 million investment for “*green water transportation options, including an alternative-fuel ferry and water taxi system.*” This system would include green ferries that can be leased to private operators as well as offer affordable transportation options to benefit underserved communities. We urge the legislature to increase capital authorization for DCR parkways to \$400 million and an additional \$25 million for green ferries, increasing this line item from \$176,670,000 to **\$425 million**.

Department of Fish and Game Division of Ecological Resources

Nature-Based Research and Demonstration Projects

Line Item 2300-7031

The Stone Living Lab, Boston Harbor Now, UMass Boston and our municipal, state agency, watershed associations, and conservation organizations are conducting transformative research and outreach to make vulnerable coastal regions adaptive to climate change while enhancing natural and built environments. Testing innovative, nature-based approaches to climate adaptation, coastal resilience, and ecological restoration is vital to this approach. We strongly support increased funding for the Division of Ecological Restoration (DER), an agency key to restoring streamflow to our rivers through dam removal and culvert replacement, strengthening and restoring wetlands to enhance wildlife habitat and to create resilient landscapes, and supporting ecological restoration and other nature-based approaches to mitigate flooding and heat island impacts. We request at least **\$60 million** for DER’s important work.

Municipal Vulnerability Preparedness Program

Line Item 2000-7088

The Municipal Vulnerability Preparedness (MVP) program is the cornerstone of state-level support for local resilience and adaptation planning and action. To build on its existing success, significant funding should be authorized to support participation in MVP 2.0 and investments should be made in **district scale projects that create continuous lines of defense and regional projects that cross municipal boundaries.** We applaud the Healey-Driscoll Administration for authorizing \$315 million for MVP; and grateful that MVP grants will be made available for nonprofit partners - a much-needed improvement that we’ve been seeking for several years. However, demand for MVP grants continues to outweigh existing funding and demand will increase over time as climate risks accelerate. Also, given the unique needs of densely populated cities (Boston alone faces nearly \$10 billion in coastal resilience needs), we urge the Legislature to increase this investment to **\$500 million**.

Department of Fish and Game Marine Fisheries

Line item 2300-7033

Boston Harbor Now's predecessor, the Boston Harbor Association, spent many years advocating to clean up Boston Harbor making it the jewel it is today. As a result, fisheries are healthier and our harbor is swimmable. In line with Governor Healey's Biodiversity [Executive Order 618](#), we urge the state to increase investments in this important work, and request the legislature to increase this authorization from \$5 million to **\$15 million**. Increased funding will enable the Department of Fish and Game and Division of Marine Fisheries to meet marine habitat restoration needs, and build and improve facilities to grow kelp, eel grass, oysters, and other species to restore habitat and enhance biodiversity in our oceans, while reducing wave attenuation, increasing blue carbon absorption, and sustaining our nation-leading seafood industry. These actions are critical to Greater Boston's marine economy and working ports. We also recommend adding language authorizing the Division of Marine Fisheries to fund the "*creation of marine habitat*" in addition to restoring habitat.

Resilience Revolving Fund

Outside Section 10

Boston Harbor Now supports the new Resilience Revolving loan fund to be administered by the Massachusetts Clean Water Trust to help fund municipal climate resilience projects. In combination with other local and state funding sources, including the Municipal Vulnerability Preparedness program and Coastal Zone Management grants, this fund will prove to be an important funding source for local capital projects. We hope the Legislature will consider increased funding for these loans since communities need billions to support major resilience projects, although we do not request a specific amount as we do not know enough about the capacity of each city and town to take on new debt.

Regulatory and Permitting Reform

Outside Section 31

We appreciate the state's efforts to reform regulations under Climate Resilience 1.0 including updates to regulations implementing the Wetlands Protection Act and Public Waterfront Act. The Mass Ready Act contains several permitting reform proposals that, if enacted, will further reduce delays, eliminate inefficiencies, and speed up permitting for projects incorporating coastal resilience infrastructure, especially nature-based approaches.

Boston Harbor Now supports Outside Section 31 of the *Mass Ready Act* which would provide general permits and general licenses for nature-based solutions projects and we offer a few improvements:

- In the first paragraph, we request that DEP "shall" issue such permits and licenses, instead of "may" issue...
- We also offer modest language improvements in subsection (a) of Section 31 to ensure "*nature-based research and demonstration projects*" are also eligible for general permits and licenses.
- We propose to add new language in subsection (b) of Section 31 to ensure that nature-based projects and nature-based research and demonstration projects are not limited to the area within the "harbor line." The Stone Living Lab, UMass and other partners, organizations and research institutions may seek general permits and licenses for nature-based approaches that occur in the water to protect communities from climate impacts. Our proposed language reads, "*Nature-based solutions projects and nature-based research and demonstration projects shall be eligible for coverage under a*

general license or permit under this section whether the project is within or beyond any established harbor line.” While harbor lines delineate areas where the state prevents wharves, piers and other structures from being extended into a waterbody, nature-based approaches and demonstration sites, including but not limited to boulder fields for example, are critical to reducing wave attenuation and storm damage – and in some instances may need to be extended beyond a harbor line in order to be effective.

- In subsection (g), we suggest that not all changes “in use or structural alteration of a licensed or permitted structure or fill” should necessarily require a new application to the department and propose that the word “*shall*” be replaced with the word, “*may*.” As not all alterations will necessarily require a new application.
- We also support permitting exemptions for specific types of ecological restoration projects, in line with our conservation partners. We would be happy to discuss specific proposals and language improvements at your convenience.
- Finally, we hope the legislature will put a time limit on the promulgation of reforms under this section providing the Administration with 180 days to release draft regulations for public input.

Wetlands Protection Act Amendments

Outside Section 51

In line with the permitting reforms offered in Outside Section 31 (see above), Boston Harbor Now also offers a few improvements to Outside Section 51. More specifically:

- Under paragraph two of this section, the Department of Environmental Protection is authorized to provide “general orders of conditions” for certain types of “proposed work”, including nature-based solutions projects, ecological restoration, wetlands resilience projects, and priority housing projects as long as they are “consistent with commonwealth land use planning and housing strategies and plans, climate resilient design guidelines and environmental priorities, that may be approved with a general order of conditions.” We request that “nature-based research and demonstration projects” also be included in the list of proposed work and be eligible for a general order of conditions.
- Under the third paragraph, the department is also authorized to promulgate regulations that would eliminate the requirement for “notices of intent” and “requests for determination” for certain types of proposed work, including nature-based solutions projects, ecological restoration, and wetlands resilience projects, as well as work in a wetland buffer zone as well as for priority housing projects. Boston Harbor Now requests that “nature-based research and demonstration projects” be eligible for this provision, as well.
- Finally, we hope the legislature will put a time limit on the promulgation of reforms under this section providing the Administration with 180 days to release draft regulations for public input.

Special Commission for Designated Port Areas

Section 67

Boston Harbor Now supports the creation of a special commission on [Designated Port Areas](#) (DPAs) to create an integrated statewide strategic vision for the ten DPAs in Massachusetts, including the five DPAs in Boston Harbor. The commission’s focus is vital to support working waterfronts, with their unique requirements for deep water access and specialized jobs. We are also committed to ensuring that the waterfront we build today is designed for a more resilient and inclusive future.

Special Commission to Enable Resilient Urban Coasts in the Commonwealth

New Proposal

We applaud the Healey-Driscoll Administration for including proposals in the Mass Ready Act to streamline and expedite certain permits under the Public Waterfront Act, Wetlands Protection Act, and Environmental Policy Act and regulations. However, most of these changes are designed to support permitting to replace municipal culverts, as well as for nature-based projects, wetlands resilience, and “priority housing.” State agencies still need to do more to expedite permitting in the built environment, especially in cities and along urban waterfronts. Boston alone will need up to \$10 billion to protect neighborhoods from flooding, while implementing **complex, district-wide resilience projects** to protect homes, businesses and infrastructure. Unfortunately, securing permits for just one waterfront project can take many years and cost millions to permit, hindering the construction of district-wide, continuous lines of defense.

Boston Harbor Now proposes a new, temporary commission that will bring together experts from state environmental agencies and private, nonprofit and municipal stakeholders to meet regularly over 18 months to review these issues together and create meaningful solutions to expedite permitting and enable public and private stakeholders to invest in much-needed coastal resilience projects. We have offered language creating this new commission in the attached copy of the legislation with red-lined edits.

We look forward to continued collaboration in this effort and deeply appreciate your leadership and attention to our suggestions. If you have questions or require additional information, please contact lorel@bostonharbornow.org or 617-360-1857.

Thank you for your consideration of Boston Harbor Now’s requests.

Sincerely,

Linda Orel
Chief Impact Officer
Boston Harbor Now

Enclosure