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15 State Street Suite 1100
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February 2, 2026

Via email: alexander.strysky@mass.gov

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

RE: EEA# 17026, East Boston Resilient Waterfront Project

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Dear Mr. Strysky,

Thank you for the opportunity to comment on the East Boston Resilient Waterfront Project Expanded Environmental Notification Form submitted by Weston & Sampson on behalf of the proponent, the Boston Planning Department. Boston Harbor Now has been deeply engaged in the resilience planning and waterfront activation for this area of the East Boston Harborwalk, and we appreciate the focus on closing this critical flood pathway into the City.

Boston Harbor Now's mission is to ensure that Boston Harbor, its Waterfront and Islands are accessible and inclusive, and that these special places are properly 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, especially those who have been historically excluded. We do this through a variety of initiatives - including the Stone Living Lab - with the goal of realizing our Harborwalk 2.0 vision of a vibrant, welcoming, and resilient coastline along Boston's 47-mile waterfront.

Context and Project Importance

Lewis Mall and Carlton Wharf are key waterfront sites in East Boston, both in terms of public access to the harbor and climate resilience. Built on filled tidelands, this area is a gateway into East Boston, with the MBTA Blue Line running underneath Lewis Street, a ventilation building, and a water taxi pier at Lewis Mall. The Harborwalk along these sites offers some of the best views of the Boston skyline, and connections to nearby open spaces such as LoPresti Park, Piers Park, and the Mary Ellen Welch Greenway make this waterfront one of East Boston's most important open spaces. In addition to public transportation infrastructure, the street layout, dense residential and commercial development, and municipal and private utility networks constrain possible resiliency adaptations to Lewis Mall and Carlton Wharf.

The site has been consistently highlighted as a priority flood pathway for the City, with urgent need for robust flood protection measures (Coastal Resilience Solutions for East Boston and Charlestown, 2017, 2022). Located within FEMA Zone AE, 2070 projected flood elevations will reach between 21.6 BCB (15.1 NAVD88) and 22.5 BCB (16.0 NAVD88) across Lewis Mall and Carlton Wharf, "several feet above current ground levels" (East Boston Resilient Waterfront EENF Filing, 2025). Adapting this area is critical to protect the homes and businesses along the



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waterfront, as well as the bustling neighborhoods behind the project site in Central-Maverick Square, which includes both market rate and affordable housing.

Boston Harbor Now and the Stone Living Lab are involved in activating waterfront spaces, increasing access to water transportation, and ensuring that the Harborwalk is safe, clean, and welcoming in East Boston. We launched Eastie Week, an annual collaborative celebration of the people, history, culture, music, and art in East Boston. In 2025, we celebrated the 12th year of Eastie Week, which featured 2 full weeks of summer programs including live music, fitness and yoga, kayaking, climate education, and events from local restaurants and businesses. We have been active participants in the planning and design processes around climate resilience and waterfront open space throughout East Boston, and this year we are further expanding our Climate Education and Community Engagement work and Innovation Harborwalk Grant Program to harborside sites like Lewis Mall and Carlton Wharf.

Every year, we purposefully partner with local organizations such as Piers Park Sailing Center, Greenroots, and Friends of the Mary Ellen Welch Greenway to host inclusive programs on the East Boston waterfront each year, with a focus on welcoming people to the harbor who face barriers to access.

The Harborwalk along the project site serves as an important recreational area and community space for neighbors and visitors. East Boston, and the surrounding areas, are some of Massachusetts' most diverse neighborhoods, with 39 EJ communities living within 1 mile of the project site, and 612 EJ communities within 5 miles of the project site. Thousands of residents in and around East Boston utilize their waterfront as open space to enjoy year round, especially due to the lack of large parks and green space in more inland neighborhoods.

The proposed design responds directly to the vulnerability analyses outlined in Climate Ready Boston (2016), and builds on the years of community engagement and planning that went into creating the Coastal Resilient Solutions for East Boston and Charlestown Phase 1 (2017) and Phase 2 (2022) reports.

Project Design, Creating Connections

At Carlton Wharf, the design includes an “elevated, pile-supported Harborwalk located seaward of a new reinforced concrete flood wall” designed to the 2070 1% AEP Design Flood Elevation (DFE) of 21.6 feet BCB (15.1 feet NAVD88) (East Boston Resilient Waterfront EENF Filing, 2025). We commend the design for this replacement Harborwalk, which will create a continuous 12-foot wide pathway with ADA-compliant grading and connections to the water, as well as new native plantings to provide habitat and protect the Harborwalk from wave action and erosion. These elements reflect the best practices outlined in Boston Harbor Now's Visualizing Harborwalk 2.0 design guidelines, and we commend the proponent for designing a public realm that goes beyond legal requirements. The flood wall at Carlton Wharf is thoughtfully designed to enhance the landscape through integrated seating structures and landscaped berms, creating new viewing angles and improved public realm.



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The proponents will elevate the public landing at Lewis Mall “through a combination of retaining walls, terraced seating, fill placement, and integrated ADA-accessible ramp systems... resulting in a level landing area at the 2050 1% AEP DFE 20.5 feet BCB (14.0 feet NAVD88)” that can be adapted to add more elevation increases in the future (East Boston Resilient Waterfront EENF Filing, 2025). The proposed updates will ensure that folks with mobility challenges can more easily access the water taxi dock, and the redesign will also create a new 12-foot-wide Harborwalk along East Pier Drive. The design of the proposed Harborwalk will tie into the existing Harborwalk at adjacent sites with discrete flood protection measures, clear sightlines, overlooks, and comfortable grades..

As an active participant in resilience planning for East Boston, we appreciated the community engagement for this project, which led to the focus on integrating flood protection to the sites in a way that blends into the landscape and does not impede access or views. We are encouraged by the guiding design approach of Weston & Sampson, who recognize that “today’s urban waterfronts must equitably serve the evolving needs of diverse communities while addressing the growing urgency of climate resilience, public access, and shared land use”(East Boston Resilient Waterfront EENF Filing, 2025). As we elevate and adapt our coastlines across the Boston Harbor region, Boston Harbor Now and the Stone Living Lab focus on maximizing the co-benefits of climate resilient waterfronts, enhancing and creating new public access to the water, parks and open spaces, and native habitats. The thoughtful design of these new Harborwalk segments will protect neighborhoods on the coast and behind the site, and improve resident and visitor experience on the waterfront while enhancing views of the Boston Harbor.

Boston Harbor Now supports the proposed project as a reflection and response to the shared priorities of the City of Boston and the surrounding community with respect to “flood protection, resiliency and future adaptability, public access, constructability, cost, environmental impacts, regulatory compliance, and community and operational/maintenance effects” (East Boston Resilient Waterfront EENF Filing, 2025).

We appreciate the detailed alternatives analysis conducted by the consultant to consider differences between a “no action” scenario and multiple adaptation options. For Carlton Wharf, options like raising existing seawalls would cut people off from the water and limit stormwater benefits, while integrating a berm into the small open space would result in high O&M costs and disrupt access to the existing dog park. At Lewis Mall, alternatives such as increasing fill could negatively impact the MBTA infrastructure under the site, and deployables were deemed to be too operationally intensive. The final adaptations selected to move forward for design, engineering, and permitting in this EENF will not only protect neighborhoods from coastal flooding, but also improve public realm, ADA accessibility, playing surfaces, and stormwater drainage.

Site and District Resilience

To the north of Carlton Wharf, the proposed line of defense continues from the



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existing dog park and butterfly garden until it meets LoPresti Park. The southern end of the proposed Carlton Wharf adaptations are designed to tie into the Clippership Wharf high ground without long ramps or awkward landings, increasing coastal resilience and aligning with Ch.91 and public accessibility goals. Lewis Mall and Carlton Wharf are connected to each other by Clippership Wharf, which underwent a redesign process to enhance climate resilience in 2021. The Clippership site was raised significantly higher than surrounding streets, with “site elevations ranging from lows of 18.5 feet-BCB (12.0 feet-NAVD88) in the southwest to highs of 22.5 feet BCB (16.0 feet-NAVD88)” (East Boston Resilient Waterfront EENF Filing, 2025).

By tying in the proposed adaptations in this project to the existing grades at Clippership, the East Boston Resilient Waterfront Project creates a more continuous line of defense, providing district-level flood protection. This line of resilience and public access continues through the Clippership site to meet the proposed updates to Lewis Mall. To the south of Lewis Mall, the new flood protection wall in this project will connect with the proposed concrete flood wall between the public landing and Pier One. This project is vital to connect existing high grades along East Boston’s waterfront and create more continuous protection and access.

In conclusion, we support advancing the design, engineering, and permitting for this proposal, helping improve accessible open space and coastal resilience at key East Boston waterfront sites and two of the area’s most threatening flood pathways. We support the proponent’s desire to build new elevated Harborwalk, retaining walls, terraced seating, and landscaping to improve and protect East Boston’s homes, businesses, infrastructure and human health and safety for now and in the future. We are confident this project will improve public open space and draw more people to the waterfront.

We are grateful for the opportunity to comment on this priority project and look forward to participating in the upcoming regulatory processes to discuss ways to activate the site and create a more welcoming public realm. We would be happy to answer any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Abbott".

Kathy Abbott
President and CEO
Boston Harbor Now