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February 23, 2026

Via email: Katherine.Miller3@mass.gov

Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114
Attn: Katherine Miller

RE: EEA #16991- *North End Community Center DEIR*

Dear Ms. Miller,

Thank you for the opportunity to comment on the North End Community Center Draft Environmental Impact Report prepared by Epsilon Associates, Inc on behalf of the proponents, the Boston Public Facilities Department and Boston Center for Youth and Families. As the designated nonprofit partner to implement the City's MOU on the Boston Harborwalk, we are excited to see this project bring more public amenities to one of the most visited areas along the City's waterfront.

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.

Flood Infrastructure Design and Coordination

Given that "portions of the Project Site are located within the 100-year floodplain with a Base Flood Elevation at 10.0 feet NAVD88," (16.4-foot BCB), the site must be elevated to protect the amenities within the project and the neighborhood behind the community center (North End Community Center DEIR Filing, 2026).

We appreciate that "the proposed building's ground floor will be constructed at approximately elevation 23-feet BCB," exceeding the Design Flood Elevation and incorporating a forward-looking resiliency strategy. Additionally, the stormwater management system is designed to attenuate 7.7 inches of rainfall during a 2070 25-year, 24-hour storm event, reflecting the use of future climate projections in system sizing (North End Community Center DEIR Filing, 2026).

The coastal flood performance modeling demonstrates that the project reduces on-site flood risk under 2050 and 2070 1% AEP storm scenarios and does not exacerbate flooding on adjacent properties. However, as acknowledged in the DEIR, area-wide flooding persists as external flanking pathways would eventually need to be addressed by larger, regional mitigation approaches.

We therefore encourage the Final EIR to further clarify how this project's site-scale resilience investments align with and support district-scale flood protection strategies



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identified in the City's Coastal Resilience Solutions for Downtown and the North End. Specifically, the project should demonstrate that its elevation strategy and seawall improvements will not preclude future regional flood barriers and will allow for coordinated tie-ins at adjacent parcels as district-scale protection is advanced.

Harborwalk Design, FPA Space and Open Space

We urge that the pile-supported Harborwalk be advanced as part of the base project rather than as an alternative, given its clear public benefit, consistency with Chapter 91 goals, and as the primary Mitigation Measure listed under the Environmental Justice Section in Table 10-2. The creation of a new Harborwalk around the site was continually a priority throughout the community engagement process, as noted multiple times in the filing (North End Community Center DEIR Filing, 2026). This connection would significantly enhance continuity between Langone Park, the Puopolo Athletic Field, and adjacent waterfront segments.

As outlined in the 2018 Climate Resilient Design Standards & Guidelines for Protection Of Public Rights-Of-Way, published by the Boston Public Works Department, Boston's Harborwalk is expected to be at a minimum of 12-foot wide. Additionally, Boston Harbor Now's Visualizing Harborwalk 2.0 guidelines showcase the current best practices for Harborwalk design. We believe that to center equity in waterfront development is to focus on strategies that make the waterfront feel safe and inclusive through lighting, multilingual signage, full ADA accommodations, affordability, community relevancy, and the elimination of features that make users feel unwelcome or excluded, which we hope to see incorporated into this project and enumerated in future planning documents and phases of review.

We understand that there is a chance that the Harborwalk constructed at 15-foot NAVD88 (21.46BCB) may be flooded by coastal storms throughout the designated 2070 planning horizon even though the Harborwalk was determined to have a return period of the 500-year storm (North End Community Center DEIR Filing, 2026). We expect that on days where the Harborwalk is expected to flood because of storm surge, the proponent will have a warning system in place to close the Harborwalk. Any maintenance repairs to the existing infrastructure to allow for further elevation in the future should be addressed and Harborwalk should be constructed with materials capable of withstanding occasional coastal flooding.

We also encourage additional clarity regarding Facilities of Public Accommodation (FPA) space and publicly accessible open space. The Final EIR should quantify publicly accessible areas before and after redevelopment and confirm that waterfront open space remains fully accessible to the public without barriers to entry.

Environmental Justice and Community Benefits

We appreciate that this project increases the benefits available to residents and families by including "an indoor gym and basketball court, multi-purpose space, meeting rooms, locker rooms, kitchen, art and media rooms, teen rooms, and staff facilities for the Boston Centers for Youth and Families" (North End Community Center DEIR Filing, 2026). Given that 44 EJ populations live within one mile of the site, this community center has the potential to significantly increase access to passive and active recreation



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opportunities.

We encourage the proponent to continue meaningful engagement with nearby Environmental Justice communities as the design advances, particularly regarding programming affordability, language accessibility, and construction impact mitigation. Given documented vulnerable health criteria in nearby communities, attention to construction-period air quality controls and long-term heat mitigation strategies including shade, tree canopy, and reflective materials will be essential.

In Conclusion, the North End Community Center project presents a meaningful opportunity to combine community investment, waterfront activation, and climate resilience. By advancing the Harborwalk as part of the base project, strengthening alignment with district-scale flood strategies, and centering equitable waterfront design, this project can serve as a model for resilient public waterfront development.

We appreciate the opportunity to comment and look forward to continued engagement as the project advances through MEPA and Chapter 91 review.

Sincerely,

Kathy Abbott
President and CEO
Boston Harbor Now