



Are you on board?

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December 3, 2021

Via email: [tori.kim@state.ma.us](mailto:tori.kim@state.ma.us)

Kathleen A. Theoharides, Secretary  
Executive Office of Energy and Environmental Affairs  
100 Cambridge St, Suite 900  
Attn: MEPA Office – Tori Kim, Assistant Secretary/Director  
Boston, MA 02114

Subject: Massachusetts Environmental Policy Act (MEPA) Proposed Regulatory  
Amendments – 301 CMR 11.00 et. seq.

Dear Secretary Theoharides and Assistant Secretary/MEPA Director Kim,

Boston Harbor Now appreciates the opportunity to offer comments as part of the Massachusetts Environmental Policy Act Unit's regulatory review effort to update its regulations and associated policies. We are grateful to have had the opportunity to participate in the Advisory Committee to support the MEPA office during this process.

Boston Harbor Now is committed to ensuring that our coastlines are resilient to the impacts of climate change. In order to meet this challenge, we are a partner in the Stone Living Lab, a partnership which seeks to make vulnerable coastal regions adaptive to climate change while enhancing natural and built environments. As part of the initial work of the Stone Living Lab, the scientific team has installed a suite of monitoring instruments on Rainsford Island in Boston Harbor to collect real-time and ongoing baseline data, and we hope that coastal resiliency research projects can advance in the near future on Rainsford Island and compare the results to the baseline information currently being gathered.

The Stone Living Lab's work plan continues to evolve with the development and design of these unique coastal resiliency pilot projects planned for Rainsford Island and other locations throughout Boston Harbor and the Commonwealth. While we expect that these projects will undergo a thorough environmental review, it is our hope that, working collaboratively with the Regulatory community, the permitting processes for these types of projects will be prioritized due to the importance of gathering both baseline and long-term climate data.

As has been pointed out during the Advisory Committee meetings, it is important that coastal resiliency research projects be able to be implemented in and around Environmental Justice communities in a similar fashion, and with similar requirements, as elsewhere. The goal of the Environmental Justice policies is, and should be, to distribute equally not just the burdens of projects, but also the benefits of environmentally friendly projects. Including coastal resiliency

research projects in the definition of “Ecological Restoration projects”, while providing the opportunity for comment, including underserved areas, is one option to achieve this outcome.

Another option would be to create a new category of project, which should not require mitigation because the purpose of these resiliency research projects is to generate data for public use and planning. These projects should be prioritized, and not be categorically required to develop an Environmental Impact Report (EIR). Instead, we suggest that the requirement for an EIR should be discretionary. An example of such a research project category could be:

“Resiliency research ” - experiments/projects undertaken under the management of an academic, scientific, or non-profit organization designed to study potential impacts and benefits of nature based approaches and understand climate change adaptation and resiliency,

Boston Harbor Now looks forward to further engagement and working collaboratively with MEPA on these potential regulatory changes. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Abbott", with a stylized, flowing script.

Kathy Abbott, President and CEO  
Boston Harbor Now

cc: Alison Brizius, City of Boston