From:	Steve Hollinger
To:	Waterways, DEP (DEP)
Cc:	Padien, Daniel (DEP); Deanna Moran
Subject:	Comment Letter on Chapter 91/Municipal Harbor Plan - Proposed Regulatory Update
Date:	Thursday, August 5, 2021 12:55:12 PM

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8/5/21

To: DEP

CC:
Daniel Padien, DEP Program Chief
Deanna Moran, CLF

Subject: Chapter 91/Municipal Harbor Plan - Proposed Regulatory Update Comment

To Whom it May Concern:

Please accept this e-mail as my public comment on Chapter 91/Municipal Harbor Plan - Proposed Regulatory Update in advance of the August 6, 2021 deadline.

1. The BPDA Downtown Municipal Harbor Plan should be considered independently of other MHPs being considered under proposed regulatory changes.

2. The Downtown MHP process was flawed, largely focused on permitting of two projects (Harbor Garage, Hook Wharf) rather than prioritizing public access and resiliency across the 42-acre scope of the MHP. Fortunately, Boston is seeing a political awakening in terms of potential of waterfronts to address both priorities, so there is an opportunity to vastly improve the planning process.

To be clear, the BPDA Downtown MHP as filed should not be approved by DEP.

BPDA should be expected to draft a Downtown MHP that prioritizes public access (including civic and cultural engagement on ground floors, beyond commercial uses). In addition, a Downtown MHP should reflect best practice in addressing anticipated, combined impacts of sea level rise, storm surge and precipitation (as well as other impacts). As I understand, the minimum expectation of such a plan would be predicated on a data-driven, district-level understanding of challenges ahead. To date, BPDA has not initiated district-level climate planning for any Boston neighborhood.

3. My views regarding the Proposed Regulatory Update are largely aligned with the Conservation Law Foundation. I would defer to CLF in terms of particulars of the proposed regulatory update(s).

Best regards,

Steve Hollinger
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