

March 31, 2021

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

Subject: MEPA Regulatory Review – 301 CMR 11.00

Dear Secretary Theoharides,

The Stone Living Laboratory (SLL) appreciates the opportunity to offer comments as part of the Massachusetts Environmental Policy Act (MEPA) Unit's regulatory review effort to update its regulations at 301 CMR 11.00 and associated policies. We understand that this effort coincides with statewide initiatives led by EEA under Governor Baker's Executive Order 569 to prepare for the impacts of climate change.

Officially launched in the fall of 2020, the SLL represents a collaboration between the Stone Foundation, the City of Boston, the National Park Service, UMass Boston, and Boston Harbor Now. The Lab is a major new research and educational initiative within the Boston Harbor Islands National and State Park focused on developing and testing innovative, adaptive, nature-based solutions to climate adaptation, coastal resiliency, and ecological restoration with an overriding commitment to equity and environmental justice.

Based on four founding principles—Research, Climate Preparedness, Education, and Policy—our vision is to create a culture where people work with nature to make coastal regions resilient and adaptive to climate change while enhancing the natural and built environment. The SLL serves as an interdisciplinary innovation hub that combines elements of scientific research and experimentation with public engagement, education, and policy development. The methods developed and lessons learned in the Lab will be used to protect coastal resources and communities across the Commonwealth from the impacts of climate change and will provide transferable and critical knowledge for national and international benefit.

As part of the initial work of the Lab, the scientific team is in the process of installing a suite of monitoring instruments on Rainsford Island in Boston Harbor to collect real-time and ongoing baseline data that will assist future project proponents in designing and creating more resilient projects in and around Boston Harbor. With this data and monitoring capacity, the SLL is positioned to become a unique resource to assist the Commonwealth in a host of climate change initiatives.



Having been officially launched less than six months ago, the Lab's work plan continues to evolve with the development and design of unique coastal resiliency pilot projects and experiments planned for Rainsford Island and other locations throughout Boston Harbor. While we expect that these projects will soon undergo a thorough environmental review, it is our hope that in the future, the regulatory processes for these unique coastal resiliency projects will be "fast-tracked" due to the importance of gathering both baseline and long-term climate data consistent with Executive Order 569. Further, we would hope that coastal resilience solutions that will have been evaluated and tested in similar environments and that have been identified by the Lab as being effective and suitable for our coastline could be similarly expedited through the MEPA process, perhaps by obviating the need for an Environmental Impact Report.

Additionally, we urge you to consider the addition of a new category of project, which, instead of requiring mitigation for their impacts, can instead be fast-tracked because of their protective beneficial impacts in response to climate change. Such a category could be:

"scientific pilot coastal resiliency projects" - projects undertaken under the management of an academic, scientific, or other qualified institution or organization designed to better understand climate change adaptation and resiliency.....that would trigger a coordinated environmental review to "fast-track" the review process.

There are likely other ways to achieve this goal, and the Stone Living Lab looks forward to further engagement with MEPA on these potential regulatory changes. On behalf of the Lab, thank you for the opportunity to comment.

Sincerely,

Paul Kirshen, Ph.D.  
Director  
Stone Living Laboratory

cc: Sonja Plesset, The Stone Foundation  
Marc Albert, National Park Service  
Alison Brizius, City of Boston  
Kathy Abbott, Boston Harbor Now