neponset river
WATERSHED ASSOCIATION

Officers & Board

Jennie Goossen, Pres., Westwood

Heather Audet, VP., Norwood

Stephen Brayton, Treas., Dedham

Julianne S. Belcher, Sec., Walpole

Cynthia Dittbrenner, Quincy

James Green, Canton

Jerry Hopcroft, Norwood

Taber Keally, Milton

Rebecca Kinraide, Sharon

Maria Lyons, Dorchester

Kyle McBurney, Dover

Martha McDonough, Readville

Robert McGregor, Sharon

Brendan McLaughlin, Milton

James O. Michel, Hyde Park

Bill Pastuszek, Colrain

Emyr Remy, Hyde Park

Dr. Cathy Stern, Canton

Grace Weller, Westwood

Joye Williams, Dorchester

September 29, 2025

via Climate Action Plan Summer Release Feedback Form

Boston Environment Department
Attn: Elizabeth Jameson
1 City Hall Square
Room 709
Boston, MA 02201-2031

Re: Draft 2030 Climate Action Plan

Dear Ms. Jameson,

The Neponset River Watershed Association (NepRWA) is a member-supported nonprofit organization dedicated to the improvement and protection of the Neponset River and its Watershed. Included in that mission is a commitment to supporting resilience efforts throughout the region. It is with this mission in mind that we submit these comments on Boston's 2030 draft Climate Action Plan (CAP).

NepRWA appreciates the considerable effort that Boston staff have put into the draft plan. As an organization in the community-based partner program, we commend City staff for the thought and effort they have put into engaging community voices from across the City. We look forward to seeing the active engagement continue throughout the remainder of the process.

In response to the feedback survey[1], NepRWA respectfully submits the following comments:

What, if anything, made the Climate Action Plan hard to follow or understand?

The current plan is very text-heavy and does not include information on cost, effort, timeframe, or benefits (either in terms of CO_2 emissions or qualitative statements about achieving the climate justice framework goals). Without this information, there is no evaluation of how effective strategies in the "continue, grow, and scale" category have been, and if any changes need to be made. Adding in quantitative (equivalent tons of CO_2 reduced) or qualitative (which climate justice principles are addressed) would provide clarity and help residents when evaluating strategies.

[1] https://docs.google.com/forms/d/e/1FAIpQLSfAAUY19gq6UT0u0kh6Ffghg1IzlKqz1jMxj-w1VOdHeTJYEg/viewform

2173 Washington Street, Canton, MA 02021
781.575.0354 | staff@neponset.org | www.neponset.org

Are there strategies or topics you feel are missing or need to be strengthened?

Currently, there is no mention of retreat or strategic relocation, and how this interacts with climate justice principles and housing/development.

Climate Resilience Strategies

- Strategy H2: Does the city need to establish its own worker protections, or can we adopt other standards?
- Strategy S2 and S3: What does a "citywide green infrastructure standard" mean? The Office of Green Infrastructure (OGI) has successfully promulgated standard design details for green infrastructure in the right of way across Boston. OGI is not listed as a partner on the CAP website, but would be a valuable partner on this effort.
- Strategy X4: Support Community Resiliency hubs: it is unclear in the draft what entities fall under "community institutions" and if this includes public or nonprofit organizations? Strategy X4 mentions complementing cooling centers and emergency shelters. It might be possible to combine these with places in the community that residents already frequent and are familiar with, such as libraries, public schools, or parks with adequate facilities.
- There is an opportunity to incorporate nature-based approaches like preserving and improving natural resources more actively within the climate resilience strategies. The preservation and improvement of existing natural resources like forested urban parks and saltmarsh provides more than stormwater management. Protecting salt marsh and providing pathways for salt marsh migration increases coastal resilience, and acknowledging the ways in which these ecosystems support multiple strategies is key to ensuring those benefits are maintained and strengthened by the CAP.

Boston Green New Deal (GND) Coalition Nature Based Strategies (NBS) Climate Priorities

As a member of the Boston GND Coalition and the NBS working group, NepRWA agrees with the NBS working group that the CAP should:

- Ensure comprehensive urban tree protection by monitoring the Public Tree Ordinance implementation and advocating for a Private Tree Ordinance to enhance citywide canopy preservation.
- Engage and advocate for equitable Wetlands Ordinance Phase III process.
- Champion policies and projects that expand and protect urban green spaces through land acquisition, preservation, restoration, sustainable planning, and strategic partnerships.
- Champion projects and policies that restore and enhance the Neponset River and surrounding areas by supporting Superfund clean-up efforts, expanding connections to the Blue Hills, and working with the EPA and DCR to create safe walking paths and recreational spaces.
- Champion NBS throughout the Boston Harbor to increase equitable access to waterfront open spaces and protect the city from storms, flooding, and sea level rise.

Additional Thoughts and Comments

- We applaud Boston for including the third category of 'evaluate and explore' strategies and are happy to see that the City is willing to try new ideas. However, we have two points of concern:
    - More information is needed to fulfill the promise of this group of strategies. NepRWA would like to see the inclusion of funding or other support for community organizations that want to pilot new methods.
    - What criteria will determine if these new strategies are worthwhile? Will they be measured with the same framework as the more established strategies? There is not enough information in this version of the draft to explain how new 'evaluate and explore' strategies will be evaluated.
- The City has made a real effort to incorporate thoughtful principles. However, there is no information on how the City will evaluate if strategies are aligned with the guiding principles that have been laid out.
- We commend the inclusion of the community ownership/partner program. It is good to see that the City is convening partners. NepRWA would like to see this expanded upon in the next draft by identifying private and institutional partners across the city.
    - Regarding "community partner ownership" of some of these strategies, there is no clear mechanism for community organizations to update the City about work that is being done by community partners. Establishing a reporting system that enables two-way communication seems critical to the success of these efforts.

Conclusion

In sum, NepRWA is pleased with the efforts made by the city of Boston to advance on its ambitious climate goals. Thank you for the considerable time and effort the city has put into this important work, particularly to the Environment Department for leading this effort. We look forward to working together with the city to protect our natural resources and work towards a more resilient and just future.

Sincerely,

Anna Yie

Anna Yie
Green Infrastructure Specialist