Memo

SUBJECT
Costal Resilience Districts – Summary of Findings and Recommendations for Implementation

DATE
September 2026

TO
Town of Nantucket, MA
Natural Resources Department

ATTN
Vincent Murphy, Sustainability Programs Manager

Executive Summary

Chapter 66 of the Nantucket Bylaws (passed at Annual Town Meeting in 2024) authorizes the Town to utilize Coastal Resilience Districts (CRDs) as a targeted funding tool to advance localized projects that reduce risks from coastal erosion, flooding, sea level rise, and related hazards. Under this framework, the Town may define the area that benefits from a project and assess costs among affected property owners in proportion to the benefits they receive. Broader municipal funding would be reserved for projects with island-wide benefits.



Photo Credit: Erin Robinson, Arcadis

The CRD framework is more targeted than island-wide taxation, more flexible than relying on grants or capital funding alone, and more equitable than distributing the full cost of a localized improvement across the entire tax base. Additionally, it provides a pathway for residents or neighborhood groups to bring forward localized resilience priorities for Town consideration, facilitating required municipal review, Town Meeting approval, and Select Board action. By aligning costs with benefits, CRDs can reduce the amount that must be supported by Nantucket's general taxpayers while helping protect neighborhoods and small communities with high coastal risks. CRDs would supplement rather than replace grants, capital funding, bonds, and other municipal resources to help close funding gaps related to project planning, design, construction, monitoring, maintenance, and long-term adaptation.



Photo Credit: Erin Robinson, Arcadis

This document proposes a six-step process for implementing CRDs that provides a consistent and transparent approach to initiating and screening projects, engaging affected communities, defining beneficiaries and district boundaries, securing Town Meeting approval, and allocating assessments in accordance with state and local law.

Introduction

The Town of Nantucket Natural Resources Department has engaged Arcadis to support the evaluation and advancement of Coastal Resilience Districts (CRDs) as a funding mechanism for local resilience projects. Under Chapter 66 of the Nantucket Bylaws as passed at the 2024 Annual Town Meeting (ATM), the Town is enabled to establish CRDs through which property owners who benefit from coastal resilience improvements share in the costs of planning, construction, monitoring, and maintenance for projects that reduce risks from coastal erosion, shoreline change, sea level rise, flooding, and other coastal hazards. In contrast to the Coastal Resilience Districts utilized as the state level in Massachusetts, the CRDs considered in this memorandum are a funding tool rather than risk assessment tool.

This document summarizes findings and describes a recommended framework for the implementation of CRDs on Nantucket. These recommendations were developed through evaluation of precedent case studies considered in the context of the Massachusetts regulatory environment as well as current and projected environmental conditions on Nantucket. It is intended to support the continued consideration of CRDs as a funding tool to facilitate implementation of resilience projects.

Previous and Ongoing Resilience Planning Efforts

Work to evaluate and advance CRDs builds on ongoing resilience planning efforts on Nantucket, including both island-wide programs and infrastructure projects at multiple locations. This effort is directly tied to the Nantucket Coastal Resilience Plan, which outlines a comprehensive island-wide roadmap for near- and long-term resilience that reduces risk from coastal flooding and erosion exacerbated by sea level rise. Since completion of the CRP in 2021, the Town has continued to move priority recommendations forward through project-specific feasibility studies, design efforts, public engagement, and implementation planning. These include the Feasibility Study and Design for Flood Mitigation on Easy Street, Island-Wide Strategic Retreat and Relocation Planning, Nantucket Harbors Sediment Transport and Dredge Plan, Baxter Road Alternative Access and Utility Relocation, Surfside Wastewater Treatment Facility Resilience Project, and others.

The scale and range of these efforts illustrate that implementing Nantucket's resilience priorities will require substantial and sustained investment over both the near- and long-term. Needed feasibility studies, design and permitting, construction, monitoring, maintenance, and long-term adaptation actions all carry costs that are likely to exceed what can be supported through existing funding sources.

Resilience Funding Mechanisms

To date, Nantucket has used a range of funding mechanisms to advance resilience planning and project development. These have primarily consisted of state and federal grants supplemented by local tax revenues. As the Town moves from planning into implementation, it is evaluating how existing mechanisms can continue to be used and where additional tools, such as CRDs, may be needed to help fund specific project types. The Town's goal is to identify and utilize funding mechanisms that are sufficiently predictable and flexible to fund the full lifecycle of resilience projects needed in the future while equitably reflecting project benefits.

Existing funding mechanisms that the Town may use to fund resilience projects include the following:

- **Betterments:** Under Massachusetts law, municipalities may assess a special tax on properties within a limited and determinable area that receive a special benefit from a public improvement. These may also be referred to as a special assessment fee. For Nantucket resilience projects, this mechanism may be

relevant where a coastal improvement protects a defined set of properties or infrastructure, but assessments must be tied to the benefit received.

- **Property Taxes:** Property taxes are Nantucket's broadest local revenue source and can support general municipal services, capital investments, and debt service for public projects. For resilience, property taxes may be appropriate for projects with community-wide or island-wide benefits, but they distribute costs across the full tax base rather than targeting those who benefit most directly.
- **Municipal Bonds:** Massachusetts municipalities may borrow for eligible capital projects, typically through general obligation bonds approved through Town Meeting. For Nantucket resilience projects, bonds may help finance large upfront design or construction costs, but repayment generally relies on future tax revenues or other dedicated funding sources.
- **Borrowing and Financing Programs:** Beyond traditional bonds, Massachusetts municipalities may use state infrastructure financing programs to help manage upfront project costs and bridge funding gaps. Relevant programs include Build for Mass, a new MassDevelopment-administered revolving loan program for municipal infrastructure, clean energy, climate resilience, and economic development projects, as well as the Massachusetts State Revolving Fund programs administered through the Massachusetts Clean Water Trust for eligible water, wastewater, stormwater, and related infrastructure projects.
- **Lodging Tax:** Nantucket receives local revenue associated with visitor accommodations, including hotels and short-term rentals, through Massachusetts room occupancy and local option taxes. Because tourism places seasonal demand on public infrastructure and access to coastal areas, lodging-related revenues may help support resilience needs with a clear nexus to visitor-serving assets, although use of these funds may be subject to statutory and local restrictions.
- **Grants and Donor Contributions:** Grants have been central to funding Nantucket's resilience planning and project development. The Town has successfully pursued funding through a number of programs including the state-level Coastal Zone Management and Municipal Vulnerability Preparedness programs and the Southeast New England Program (SNEP) at the federal level. Local grants have also supported coastal resilience efforts. Grants and donor contributions can reduce the local cost burden, but they are competitive, time-limited, and often insufficient to fund long-term construction, maintenance, and adaptation needs on their own.
- **Land Bank:** The Nantucket Land Bank is funded through a local real estate transfer fee and has played a major role in open space, recreation, and public access on the island. While its mission and statutory authority are distinct from municipal resilience finance, Land Bank-owned lands, public access areas, and coastal open spaces may intersect with resilience priorities. Coordination could allow resilience considerations to be integrated into their decision-making, although the potential role of the Land Bank in coastal resilience is limited to projects with a clear intersection with their priorities of conservation, recreation & agriculture.

Despite the range of funding mechanisms available to the Town, a gap remains for localized resilience projects that provide both public and private benefits but do not fit neatly within existing funding structures. Grants and donor contributions are important but competitive, time-limited, and increasingly politically volatile; property taxes and lodging taxes are broad-based tools that may not align costs with the properties that benefit most directly; and bonds or state financing programs can help manage upfront costs but still require a repayment source. Betterments and special assessments offer a closer connection between benefit and cost, but they require a clear basis for identifying beneficiaries, assigning proportional costs, and securing project approval through the Town's existing decision-making process. As a result, the remaining need is not simply for more funding, but for a targeted, flexible, and fair mechanism that can help fund the planning, construction, monitoring, maintenance, and long-term adaptation needs of projects where benefits are concentrated in a defined area.

CRDs are intended to help fill this gap as an additive funding tool, not a replacement for existing funding mechanisms such as those noted above. They provide a framework for connecting localized resilience investments to the properties and people that benefit from them, while still allowing the Town to combine CRD revenues with other funding sources where appropriate. In this way, CRDs can support the advancement of resilience projects identified both through the CRP and through conversations with residents.

Coastal Resilience Districts

Coastal Resilience Districts are intended to provide Nantucket with a structured way to fund localized coastal resilience projects when the benefits of an improvement are concentrated in a specific area rather than distributed evenly across the island. The framework is designed for projects that reduce risks from erosion, flooding, sea level rise, shoreline change, or related coastal hazards and that may protect a mix of public infrastructure, public access, utilities, private property, and neighborhood assets. In this context, CRDs function as an additive funding tool that can supplement, rather than replace, grants, capital planning, municipal revenues, borrowing, or other available funding sources.

Under Massachusetts General Laws Chapter 80, municipalities may assess betterments, or special property taxes, on properties that receive a special benefit from a public improvement. This authority provides an established mechanism for allocating the cost of certain public improvements to the properties that benefit from them. However, Massachusetts does not currently have a general law that specifically authorizes municipalities to create coastal resilience districts with the power to fund projects through betterment assessments. This distinction is important for Nantucket because many coastal resilience projects are likely to provide concentrated benefits to defined areas, but do not fit neatly within traditional island-wide funding approaches.

Chapter 66 of the Nantucket Bylaws was adopted in 2024 to create a local framework for applying this benefit-based funding concept to coastal resilience projects. The bylaw gives the Town authority to define the boundaries of a CRD for a given project so that those who benefit from the protection may share in project costs, with the proportion of payment aligned with the proportion of benefit received. In doing so, Chapter 66 provides a Nantucket-specific pathway for using CRDs as a targeted funding mechanism for localized resilience projects where costs and benefits can be reasonably connected.

Chapter 66 defines two types of CRDs:

- **Islands Coastal Resilience District:** The land constituting the Islands Coastal Resilience District (the “ICRD”) is the entirety of the Islands of Nantucket, Tuckernuck, and Muskeget as shown on a map on file in the office of the Town Clerk.
- **Coastal Resilience Sub-Districts:** The Coastal Resilience Sub-Districts (the “Sub-Districts”) may be used for selected neighborhood-level projects. The Sub-Districts will be defined by geographical boundaries of a specific area of Nantucket to be determined by the Select Board.

The Islands Coastal Resilience District is relevant where the benefits of a project are island wide. Coastal Resilience Sub-Districts are intended for localized applications and are defined by geographic boundaries determined by the Select Board based on the area expected to benefit from a given project. For localized projects, this structure allows the Town to evaluate which properties, infrastructure, or public assets benefit from a resilience improvement and to consider how project costs could be allocated in proportion to those benefits.

Implementation under the existing bylaw requires several steps before any project could be funded through a CRD. A candidate project may be brought forward by the Town or community members, reviewed for eligibility, and categorized as either an island-wide district project or a Sub-District project. Arcadis has developed a recommended structure to ensure consistent application of the CRD framework across future projects. This

structure translates the bylaw's benefit-based funding concept into an implementable process by defining how candidate projects should be screened for eligibility, beneficiaries and district boundaries identified, and public engagement should occur.

Benefits

Utilizing CRDs has the potential to provide a variety of benefits to the Town in filling the identified gap in available funding mechanisms. Chapter 66 describes the purpose as follows:

> *The purpose of the establishment of Coastal Resilience Districts is to provide for shared funding among the property owners in the respective Coastal Resilience Districts who benefit from the coastal resilience projects and improvements. This funding will provide a key contribution to the funding sources for the planning, construction, monitoring and maintenance of coastal resilience projects in the respective Coastal Resilience Districts. The establishment of the ICRD and the Sub-Districts will enable the Town to undertake coastal resilience projects to mitigate against the effects of coastal erosion and shoreline change to the Town's coastline, sea level rise, flooding or other coastal hazards with resilience-related infrastructure to reduce the threats to life, personal injury and property damage, utilities and infrastructure which service the various Coastal Resilience Districts, prevent the occurrence of public emergencies, avoid the loss of roadways and utility services, reduce damage to public and private property, and provide for the planning and preparation of coastal resiliency measures to protect and preserve the Sub-Districts as well as the entire IRCD if the benefits are island-wide.*

CRDs provide a way to connect the cost of a specific coastal resilience project to the area and properties that receive a defined benefit from that project. This makes the framework potentially more targeted than island-wide taxation, more flexible than relying on grants or capital funding alone, and more equitable than distributing the full cost of a localized improvement across the entire tax base. In this way, the CRD model reflects the core principle that those who benefit most directly from a project should contribute most directly to its implementation.

CRDs may also facilitate projects that protect both Town assets and private properties, particularly where a resilience intervention benefits roadways, utilities, public access points, coastal infrastructure, neighborhoods, and adjacent parcels. The framework gives the Town a formal process for evaluating candidate projects, identifying beneficiaries, defining district boundaries, conducting public engagement, and determining how costs could be allocated in proportion to benefit. It also provides a pathway for residents or neighborhood groups to bring forward localized resilience priorities for Town consideration, facilitating required municipal review, Town Meeting approval, and Select Board action. As a result, CRDs can support implementation by pairing a locally tailored turnkey funding mechanism with a transparent decision-making process.

Precedents

To inform implementation of Chapter 66 through development of a recommended CRD structure for Nantucket, the Arcadis team researched relevant precedents from across the United States. Models considered included coastal resilience funding districts, unconventional applications of special assessment models, infrastructure financing tools (such as Tax Incrementing Financing), and other governance approaches used to allocate costs for public improvements with defined beneficiaries.

The precedent review focused on identifying transferable lessons for Nantucket's legal, municipal finance, and coastal resilience context, rather than replicating any single model directly. Taken together, the examples reinforce that Nantucket's approach should be tailored to local governance and finance constraints, and

structured around a clear relationship between project benefits, district boundaries, and cost allocation. Key takeaways from the precedent review include:

- **Define the benefit area before defining the funding area:** The recommended framework should begin with an assessment of what the project protects and who benefits from that protection before drawing district boundaries. This approach is consistent with assessment-based models in other states and is particularly important for Nantucket because CRDs must be defensible under Massachusetts betterment principles and Chapter 66.
- **Evaluate the relative weight of localized and broader benefits:** The framework should assess the extent to which a single project provides benefits to directly protected properties, nearby secondary beneficiaries, Town assets, and the broader island community. This evaluation should inform how costs are allocated among a Sub-District, the Islands Coastal Resilience District, and other funding sources, rather than treating projects as exclusively localized or island wide.
- **Distinguish between direct and indirect benefits:** The framework should differentiate properties and assets that are directly protected by a project from those that receive indirect or secondary benefits, such as improved access, reduced service disruption, or broader community resilience value. This distinction should be used transparently to determine whether beneficiaries contribute at different levels and how any public or island-wide share of project costs is justified.
- **Use CRDs as one layer in a broader funding strategy:** Precedents show that district-based funding tools are most effective when they supplement, rather than replace, grants, capital funding, bonds, state financing programs, or general municipal revenues. Nantucket's framework should treat CRDs as an additive mechanism used to close specific implementation gaps.
- **Keep the cost allocation method transparent and proportional:** The framework should provide a clear rationale for how costs are assigned among public beneficiaries, primary private beneficiaries, secondary beneficiaries, and any broader municipal contribution. Further, this rationale should be applied consistently across all projects. This will be important for public acceptance, legal defensibility, and Town Meeting approval.
- **Build public engagement into the process for defining district boundaries:** Because CRDs involve assigning project costs to benefiting properties, engagement should occur early in the process, before district boundaries or assessments are finalized. This should allow residents and property owners to understand the project need, the proposed resilience solution, the basis for benefit, and how the funding structure may be developed.
- **Preserve flexibility for different project types:** The recommended structure should be able to accommodate direct flood or erosion protection projects as well as related access, utility, infrastructure, and maintenance needs. This flexibility is important because Nantucket's resilience projects will vary by geography, hazard, protected assets, and mix of public and private benefits.

The precedent review confirmed that Nantucket is not alone in confronting the challenge of how to fund climate resilience implementation at the local level. The scale, timing, and complexity of resilience projects facing frontline coastal communities like Nantucket increasingly exceed what existing funding mechanisms can reliably support on their own. Communities across the country are testing different approaches to connect resilience investments with the people, properties, and public assets that benefit from them, but no single model fully resolves the legal, financial, and equity considerations involved. Nantucket's recommended CRD framework is therefore informed by these national examples while recognizing that the Town must adapt and innovate in ways that can position Nantucket as a model for other municipalities facing similar coastal resilience funding challenges.

Progress To Date

Work to implement CRDs has developed over several years as Nantucket moved from island-wide resilience planning toward project-level implementation. CRDs first emerged in April 2023 as a potential funding model during neighborhood-level engagement for resilience projects and were elevated to an island-wide discussion later that year when recent engagement outcomes were brought before the Select Board.

In the fall of 2023, CRDs were presented to the Coastal Resilience Advisory Committee (CRAC), which recommended that the Town pursue both a local bylaw and a Home Rule Petition at the upcoming Annual Town Meeting (ATM). The Town worked with legal support to draft language, which was reviewed and approved by CRAC and the Select Board that winter. At the May 2024 ATM, the CRD bylaw passed while the Home Rule Petition did not. During late 2024 and 2025, the Town continued to evaluate how to advance the bylaw through public education and considered whether to revisit Home Rule. In December 2025, CRAC decided to table the Home Rule Petition for the time being and focus on implementing a project using the existing authority provided by the Bylaw. The final sections of this memo address how CRDs could fit into the Town's plans and programs to support implementation of resilience projects, and the specific process the Town will take to select and finance a project using a CRD. This implementation framework was presented to CRAC in July 2026 and to the Select Board in September 2026, receiving Select Board endorsement. Recommendations from both CRAC and Select Board have been incorporated into this memo.

Path Forward

CRDs could play an important role in supplementing existing resilience programs and supporting implementation of projects. The clearest way is by providing an additional funding mechanism for early climate adaptation pathways, particularly strategies focused on adaptation and protection. CRDs can help protect neighborhoods in the long term or reduce risk in the short term while other longer-term adaptation pathways, such as retreat, are considered.

CRDs could support managed retreat in two key ways: First, they can help prepare designated receiving areas for new development as communities transition away from high-risk locations. For example, if Area A is identified for retreat and Area B is designated as a receiving area, a CRD could encompass Area A and generate revenue to fund the infrastructure improvements needed in Area B to accommodate future growth. Similarly, if Area C is not retreating but depends on utilities or transportation infrastructure located within Area A, CRD funding could support the development of alternative infrastructure or access routes to maintain service continuity as retreat occurs.

Second, CRDs could provide a funding mechanism for the removal of Town-owned utilities and infrastructure in retreat areas. In locations experiencing significant erosion or other hazards, retreat may require not only the relocation of homes but also the decommissioning and removal of supporting infrastructure. A CRD could enable retreating property owners to contribute toward the costs of utility and infrastructure removal after relocation has occurred, reducing the financial burden currently borne by the Town for abandoned infrastructure left behind in vulnerable areas.

At this stage, the Town's Retreat and Relocation Plan focuses primarily on education, awareness, process improvements, and the development of incentives and disincentives that encourage proactive retreat, rather than prescribing where retreat should occur. The plan will include recommendations identifying areas suitable for relocation and more detailed guidance regarding the retreat and relocation of town-owned assets. As a result, CRDs are likely to be most valuable as a future implementation tool as the retreat and relocation program becomes more mature and geographic priorities are more clearly defined.

Implementation

As the Town moves to integrate CRDs into its resilience funding toolbox, a standard process for reviewing and setting up the CRD will provide a framework to guide the implementation process. The following 6-step process can be taken to implement the use of a CRD for the funding of resilience projects.

1. **Initiate**: A project is brought forward by the Town or community members as a candidate for funding through a Coastal Resilience District.
2. **Approve**: The Town reviews the project for eligibility as a CRD, and if eligible, categorizes the project as an ICRD or Sub-District.
3. **Listen & Inform**: The Town conducts public engagement within the applicable engagement area. Engagement will focus on the importance of the project and the proposed solution.
4. **Define**: The Town determines who will benefit from the project using the Benefit Framework and draws the boundaries of the Sub-District.
5. **Vote**: The Town must bring a project to ATM for approval of both appropriation of initial funds AND approval of the use of betterments to fund the project within the mapped CRD.
6. **Allocate**: If approved, the Select Board will then set the betterments according to Massachusetts law.

Each of these six steps are described in further detail below.

Initiate

The implementation of a CRD as a funding mechanism for resilience projects begins when a project is identified and brought forward by either the Town or community members as a potential candidate for CRD funding. While it is likely that the first project to use this funding mechanism will be brought forward by the Town, one significant benefit of Coastal Resilience Districts is that it provides a pathway for residents to advocate for localized projects from which they will benefit, and for which they are willing to financially contribute.

If a project is brought forward by community members, 60% of anticipated benefitting residents are required to sign a petition to the Select Board, stating that they are willing to pay betterments assessed to them by the Town. This requirement was voted to be added to the implementation process by the Select Board at the September 23, 2026 meeting. If the project is brought forward by the Town, obtaining a similar commitment from residents should be considered. This step is meant to ensure that residents are committed to paying betterments for the project before significant Town resources are used to move the project through the funding and approval process. One challenge is that the benefitting area for a given project is not delineated until step 4, after public engagement has occurred. At this early stage, it will be to the Town and Select Board's discretion which properties are anticipated to benefit, and therefore whether the 60% threshold has been met.

Approve

The Town then evaluates the proposed project to determine whether it qualifies under the CRD framework. The following eligibility criteria must be met:

- The project must reduce risks from erosion, flooding, imminent sea level rise, shoreline change, or related coastal hazards.
- The project must benefit a public asset such as a Town beach, a parking lot, a public beach access point, a Town road, or other Town infrastructure. If the project only benefits private resources, the project does not qualify.
- The project must benefit existing structures, rather than enable or support future development.

In addition, other evaluation considerations include:

- Will the project adequately reduce risk?
- Is the project feasible and cost effective?
- Does the project align with Town plans and strategies, such as the Coastal Resilience Plan?

If the project is deemed eligible, the Town will classify it either as an ICRD project or a Sub-District. For ICRD projects, the near-term recommendation is for these projects to be funded through the capital program. Since the capital program provides an established and successful pathway for funding, it is recommended that near-term funding through CRDs focuses on Sub-Districts. In the long-term, CRD's provide an additive funding mechanism to increase total funding or improve flexibility for funding resilience projects with island-wide benefit. Once classified, the project will be brought to CRAC for review and recommendation to the Select Board. The Select Board will then make the final decision on whether the project should move forward as a CRD.

Listen & Inform

Once eligibility has been established and the Select Board has approved the project, the Town will conduct public engagement in the general area that will benefit from the resilience project. These outreach efforts are intended to inform stakeholders and the public about the project's purpose, communicate the resilience challenges it addresses, and gather input on the proposed solution. Public engagement will aim to build community understanding and support while emphasizing the importance of the project. Engagement will **not** include information on the boundaries of the CRD or expected payment amounts, since the project will need to go to ATM for approval before these details are set.

To guide the Town's engagement efforts, Figure 1 below shows areas where coastal resilience projects are most likely. The coastal region is broken into smaller areas that align with the planning areas delineated in the Coastal Resilience Plan. Boundaries for each area intentionally overlap, to reflect the intention that any engagement be inclusive and open to all residents, with a focus on the area where the project is taking place. It is recommended that Figure 1 be used internally to guide the Town, rather than externally. Based on feedback from CRAC collected at the August 28, 2026 meeting, the areas shown in the map may be misinterpreted by the public as the boundaries of a CRD.



Figure 1. Engagement Areas for Coastal Resilience Projects, for Town Use

At the recommendation of CRAC, a second version of the engagement areas map is provided in Figure 2. This version combines all coastal areas to demonstrate to the public where CRD projects are most likely to be located. This version of the map may be more appropriate for public use as it is less likely to result in misunderstandings regarding the boundaries of CRDs.



Figure 2. Engagement Areas for Coastal Resilience Projects, for Public Use

Define

Following community engagement, the Town will identify the property owners who will benefit from the project and define the boundaries of the CRD. By definition, the boundaries of the CRD will encompass all primary and secondary beneficiaries of the resilience project. General definitions include:

- Primary Beneficiary: A property owner who will receive greater benefits from a project, within a two-tiered system of primary and secondary beneficiaries.
- Secondary Beneficiary: A property owner who will receive lesser benefits from a project, within a two-tiered system of primary and secondary beneficiaries.

A conceptual diagram of a CRD, including primary and secondary beneficiaries, is provided in Figure 3 below.

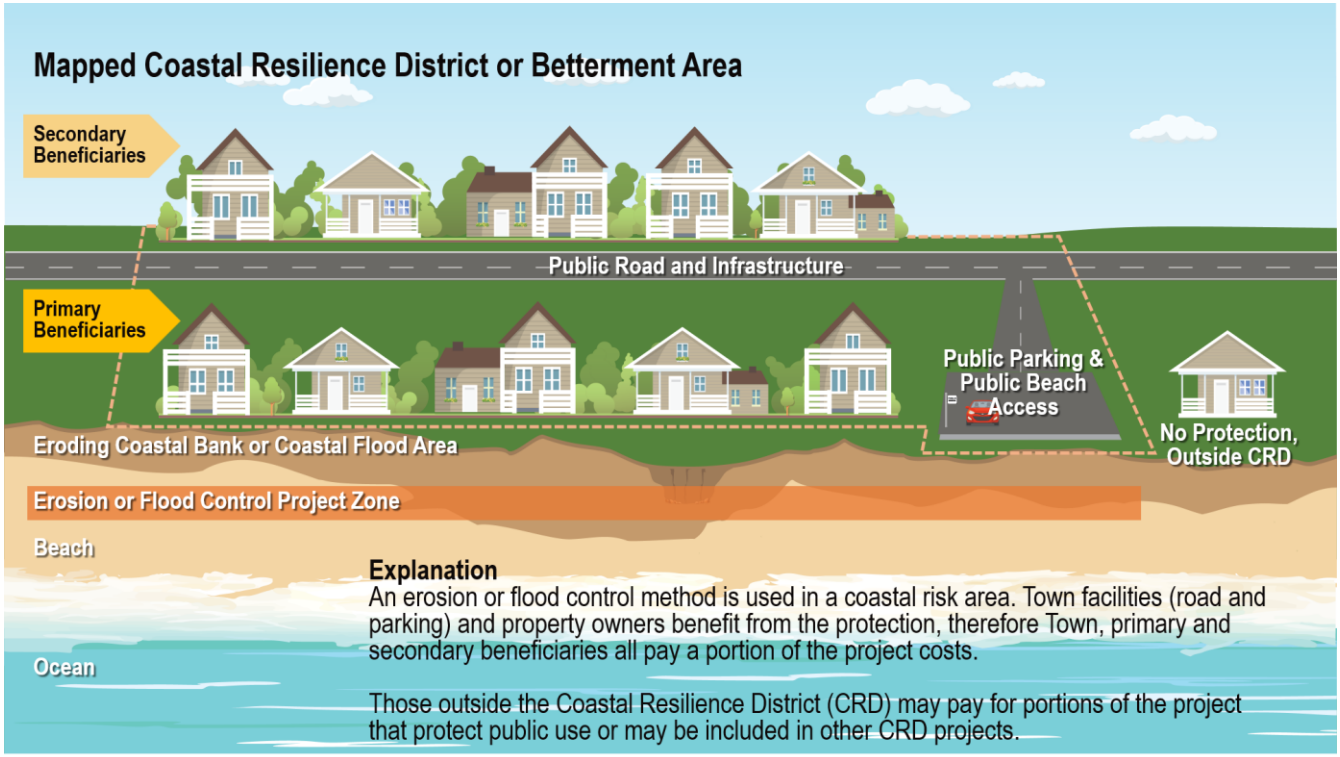


Figure 3. Conceptual Coastal Resilience District, Showing Primary and Secondary Beneficiaries

The process for determining who benefits from a resilience project, including the differentiation between primary and secondary beneficiaries, varies based on the hazard type and the project type. It is recommended that this process be data driven and follow a consistent framework to ensure defensibility of the results. A Benefit Framework has been provided to support the analysis of benefitting property owners. The Benefit Framework is set up in the style of a decision tree to provide guidance and consistency across project and hazard types. The Town, with support from engineers as needed, will complete the beneficiary analysis using the Benefit Framework as a guide.

Once primary and secondary beneficiaries have been identified, the Town delineates the boundaries of the applicable Sub-District around the appropriate parcels. It is recommended that a GIS map be created at this time, with the project area, CRD boundaries, primary beneficiaries, and secondary beneficiaries identified on the map.

Vote

The Town must then present the project at ATM and obtain approval for both the appropriation of initial project funding and the use of betterments as a financing mechanism within the mapped Coastal Resilience District. It is recommended that the Town begin preparing materials for ATM in the early fall, to ensure ample time for review by CRAC and the Select Board. Materials should focus on the benefit the project will provide, explain Town interest in the project, include a map of the CRD, and present the project cost. If CRD funding is proposed to cover operations and maintenance (O&M) costs, this cost estimate and the expected number of years of O&M should be specified. It will be up to the Town's discretion whether to differentiate between primary and secondary beneficiaries. In addition to CRAC and Select Board review of materials, it is recommended that a legal review of materials be performed to ensure compliance with the CRD Bylaw and Massachusetts law.

Allocate

If the project receives Town Meeting approval, the Select Board will proceed with establishing the betterments in accordance with Massachusetts law. These assessments should provide sufficient funding for the implementation of the resilience project, and for O&M costs if applicable. The allocation of costs should be proportional to the degree of benefit received and align with the identified primary and secondary benefitting property owners. For other types of betterments, costs are typically allocated among benefitted parcels upon completion of the project. It is recommended that the Town work closely with legal support throughout this step to ensure compliance with State and local law.