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September 18, 2026

via email: boston-csfrm@usace.army.mil

Mr. Todd Randall

U.S. Army Corps of Engineers, New England District

ATTN: COB CSRM Project Team

696 Virginia Road Concord, MA

Re: Boston Coastal Storm Risk Management Feasibility Study Draft Report

Dear Mr. Randall,

Thank you for the opportunity to comment on the Boston Coastal Storm Risk Management Study Draft Integrated Feasibility Report and Programmatic Environmental Assessment dated July 2026.

Boston Harbor Now's mission is to ensure that Boston Harbor, its waterfront, and its islands are accessible and inclusive, and that these special places are properly adapted to the risks of climate change. We advocate for climate resiliency measures that contribute to district-scale flood protection and improve ecosystem services, as well as waterfront activation that welcomes everyone, especially those who have been historically underserved. We accomplish our goals through a variety of initiatives including through our role leading the Stone Living Lab in collaboration with UMass Boston, our Harborwalk 2.0 initiative to create a vibrant, welcoming, and resilient coastline along Boston's waterfront, and through our participation on the Boston Harbor Islands Partnership as a steward of the Boston Harbor Islands National and State Park.

We commend the City and USACE team for the significant research, public engagement, and coordination toward the development of this Draft Report. Boston Harbor Now has been a key stakeholder and convener from the beginning of the Climate Ready Boston plans and throughout the neighborhood Coastal Resilience Solutions reports. We are grateful for the opportunity to support this study and work with the project team to secure the federal investment needed to protect our waterfront for generations to come.

This Draft Report effectively describes the significant vulnerability of Boston to coastal storms, and thoroughly explains the need for a connected system of projects to address the City's most critical flood pathways. As the authors highlight, when considering sea level change and increasingly frequent storms, "it is not a matter of whether these



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changes will happen, but when” (p. 20). After 10+ years of Climate Ready Boston planning, engagement, and design, and years of collaboration with USACE, now is the time to lay out a multiyear roadmap for shovels in the ground implementation of the projects described in Action Plan 2 of this Draft Report.

We offer comments along the following themes:

- The Need for a Comprehensive Funding and Implementation Plan
- Project Costs and Benefits Analysis
- Thematic Feedback on Proposed Alignments
- Opportunities for Inclusion in the Final Report
- Working Waterfront and Water Transportation

The Need for a Comprehensive Funding and Implementation Plan

We support Action Plan 2 as described in the Draft Report as a comprehensive system of projects that address the City’s most vulnerable flood pathways, and appreciate that the Project Team highlights the need for an overall implementation plan (of Action Plan 2). We urge the Project team to select Action Plan 2 as the selected plan to move forward in the Final Report. Boston has been a consistent national leader in coastal resilience planning and adaptation, and the waterfront community looks forward to working with USACE to sequence this connected series of coastal protection projects over the next 20+ years.

We believe that the Early Actionable Element (Action Plan 3, DOR1) at Moakley Park in South Boston should be considered part of this comprehensive plan, not as a separate element. As with all of the proposed alignments, DOR1 will only be fully effective when it is tied into the connecting adaptations on either side of it. Moving DOR1 through feasibility-level design and subsequent authorization and implementation should serve as a model for advancing the remaining projects in the Comprehensive system plan. The Final Report should provide a clear roadmap for advancing additional separable projects to approximately 35% design and Class 3 cost estimates, positioning them for future federal authorization and implementation.

Understanding that many of the proposed alignments in Action Plan 2 must reach the 35% design threshold to be eligible for Federal funding, there needs to be a clear plan for how USACE and the City will work together to sequence which projects they will advance to 35% design, and when. The Final Report should detail how various funding mechanisms, including the Section 203 process, could be used to advance each additional project to feasibility-level maturity for USACE review and potential Congressional authorization through the Water Resources Development Act (WRDA) funding cycles. The Final Report needs to provide a multiyear road map that prioritizes



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the Plan 2 projects over time in a way that can be used to solicit funding incrementally. This prioritization plan should distinguish implementation readiness from risk priority, and clearly describe how the Non-Federal Sponsor and USACE will phase implementation of these alignments.

The most efficient way to bring projects up to the 35% design maturity threshold is to refer to the neighborhood adaptations and alignments described in the Climate Ready Boston and neighborhood Coastal Solutions Reports. When USACE alignments are different from Climate Ready Boston proposals, we would like to see more details about how and why those decisions were made given the years of community engagement and technical planning work the City and its partners have completed to develop those proposals.

Implementing Action Plan 2 will require easements on private property throughout the waterfront. We know the City of Boston is responsible for securing such easement rights, and we appreciate how the Draft Report lays out the real estate considerations in each neighborhood section. As the City of Boston's principal partner in stewarding and activating the Boston Harborwalk, and as the Co-Chair of the Green Ribbon Commission's Coastal Resilience Working Group, Boston Harbor Now looks forward to continuing to convene property owners and supporting the Project Team's engagement efforts.

The Final Report should identify parallel resilience planning efforts and detail how alignments in Action Plan 2 will connect with projects outside the USACE study scope. In particular, we recommend that USACE clarify the roles of Massport, MassDCR, MBTA, MassDOT, MWRA, and BWSC in implementing Action Plan 2.

- We know that Massport is submitting on a comprehensive comment letter on this Draft Report detailing technical considerations from their ongoing resilience planning. We ask that the Final Report respond to Massport's comments and detail how the USACE alignments will tie into planned CSRM projects on Massport property. We also encourage USACE to work with Massport to evaluate structural, nonstructural, hybrid, and nature-based approaches for water-dependent industrial areas.
- With a significant portion of the proposed alignments on MassDCR property, the Final Plan should lay out how the project team will work with MassDCR to ensure that shoreline investments result in enhancement of public lands and access to the Boston Harbor.
- Given the reliance on mass transit infrastructure in the Boston region, protecting MBTA assets is vital. We are concerned that the proposed alignments leave portions of MBTA property vulnerable to flooding, such as the Orient Heights rail yard, Charlestown bus facility, Cabot Yards, and sections of the Commuter Rail and Red Line in Dorchester. Additionally,



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proposed elevated roadways and other vertical elements should ensure that MBTA buses can still operate along those corridors.

- The Final Report should also detail how the USACE team plans to integrate MassDOT planning throughout alignment coordination, cost allocation, and implementation.
- While we know stormwater management is deemed “out of scope” for USACE, every effort should be made to coordinate with BWSC and MWRA to ensure CSRM infrastructure supports stormwater management.

Project Costs and Benefits Analysis

We know that positive Benefit Cost Ratios (BCRs) are some of the most compelling metrics to Congress when it comes to competing for funding against other USACE project locations. The overall BCR for the Boston CSRM comprehensive plan is over 4.0, indicating the high vulnerability of the study area combined with the significant projected benefits and avoided losses for each alignment. We hope that the Final Report details estimated operations and maintenance costs, and quantifies benefits across all USACE accounts. It is vital that BCR calculations in the Final Report showcase detailed analyses into the various costs and total net benefits for each neighborhood alignment.

The Assistant Secretary of the Army for Civil Works and USACE Guidance require that the study planning process include the following:

- A plan that maximizes total net benefits (TNBP),
- A plan that maximizes net benefits consistent with the study purpose, and
- A nonstructural plan

The CSRM Executive Summary identifies Action Plan 2 as the Total Net Benefits Plan and states that benefits and effects across all four P&G accounts: National Economic Development (NED), Regional Economic Development (RED), Other Social Effects (OSE), and Environmental Quality (EQ) were considered during plan formulation. However, the neighborhood-level summaries primarily quantify NED costs and benefits. It is therefore difficult to understand how RED, OSE, and EQ considerations informed the identification of Action Plan 2 as the TNBP or the comparison of alternatives within it.

The Final Report should clearly lay out a comparison of these different P&G accounts and should more fully account for regional and operational consequences associated with critical infrastructure, transportation, maritime activity, public access, recreation, and environmental resources. A detailed, transparent analysis for each account is



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necessary for the Non-Federal Sponsor, property owners, and potential funding partners to understand the full costs and benefits for each alignment. We request that the Final Report include more clarity along the additional P&G accounts and descriptions of how they impact the TNBP:

- RED considerations of the potential regional economic impacts
- OSE considerations for the preservation of life, health, and public safety, community cohesion and growth, tax and property values, and the displacement of businesses and public facilities, and
- EQ considerations for ecosystem restoration, water circulation, noise level changes, public facilities and services, aesthetic values, natural resources, air and water quality, cultural and historic preservation, and other factors covered by the National Environmental Policy Act (NEPA).

Recent published USACE feasibility studies from San Francisco and the New York/New Jersey Harbor (NYNJHATS) studies provide a useful example for the Boston Report. These studies follow the same USACE Planning Guidance Notebook and post-2021 Federal policies. The San Francisco Waterfront study identified NED plans under different sea-level-change scenarios and then considered RED, OSE, EQ, and additional decision metrics in developing its Total Net Benefits Plan. The 2025 NYNJHATS study points out that the Total Net Benefits Plan can significantly differ from the NED-maximizing plan. We request that, in a similar fashion, the Boston Final Report feature a matrix table comparing alternatives across NED, RED, OSE, and EQ accounts, a formal explanation of tradeoffs among those accounts, and descriptions of how the TNBP influenced the proposed Action Plans.

Thematic Feedback on Proposed Alignments

1. Enhancing access to Boston Harbor through CSRM infrastructure

We agree with the Draft Report authors in that coastal adaptation projects and flood protection infrastructure should maximize Coastal Storm Risk Management (CSRM) while delivering the highest level of Total Net Benefits. Based on Boston Harbor Now's community engagement around this USACE study process, we know that communities prefer flood protection projects that enhance waterfront spaces and make them more welcoming. We commend the use of strategies that elevate the Boston Harborwalk, and understand that Harborwalk amenities such as lighting, shade structures, and elements that do not influence CSRM are considered project betterments that will need to be funded with other public and/or private monies. However, projects can enhance public access while maintaining the highest level of flood protection, which will deliver the highest possible Total Net Benefit, and promote public acceptance/support. At a

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minimum, USACE projects should not prevent future pedestrian access improvements, including perpendicular access to the waterfront.

Where a portion of the 43-mile long Harborwalk currently exists, we appreciate that USACE will prioritize maintaining that public access by replacing those sections of the Harborwalk next to or on top of USACE seawalls and levees once they are constructed. In project areas that do not have Harborwalk access at the time of Preconstruction Engineering and Design, we recommend that such designs include a 12-foot wide Harborwalk as a key element of the project to optimize Total Net Benefits. Where public access can be integrated into CSRM infrastructure without compromising flood-risk-reduction performance, USACE should evaluate those elements as part of the Total Net Benefits Plan rather than assuming they constitute non-federal betterments. Berms and floodwalls should be designed to provide the foundation for elevated Harborwalks and other public amenities. Harborwalks integrated onto USACE infrastructure should not be considered betterments, because they can be part of the base infrastructure that provides maximum CSRM. While we understand that USACE may not be able to fund the full range of betterments described in the Climate Ready Boston plans, berms and floodwalls should be designed to provide the foundation for elevated Harborwalk and other public amenities. This is essential to gaining broad support for implementation of the USACE plan.

2. Hybrid Solutions and Engineering with Nature

Boston Harbor Now serves as one of the lead partners, alongside UMass Boston, of the Stone Living Lab, a leading research partnership focused on nature-based solutions and hybrid adaptations, and our team looks forward to continuing to work with USACE on exploring nature-based and hybrid opportunities in the study area. The years of Climate Ready Boston community engagement consistently find that residents favor projects that feature hybrid, natural and nature-based features (NNBF). We believe that the Final Report needs to more thoroughly consider the opportunities for nature-based and hybrid solutions throughout the study area, and be specific about how nature-based solutions and hybrid solutions are being considered, based on USACE's own standards. It would also be helpful to further share how the USACE Engineering with Nature team is involved in the project, and more regularly engage with them.

We appreciate that the USACE project team explicitly mentions terraced seawalls and buried floodwalls as examples of hybrid solutions with natural features and processes to enhance risk reduction while offering new seating and viewing opportunities, similar to the existing seawalls at Langone Park and Martin's Park. The Final Report should offer clarity around what can be built into the base infrastructure as a core project element receiving 65% Federal cost share.



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For proposed levee alignments along the South Boston and Dorchester coastlines, we encourage USACE to include guidance on what types of vegetation could be utilized on these berms to maximize Total Net Benefit. We request that the Final Report clearly identify both Engineering with Nature opportunities such as living levees and infrastructure options such as terraced seawalls that USACE considers part of the Federal 65% total construction cost share.

3. Evacuation routes and transportation corridors

Implementation of a comprehensive coastal protection system must also ensure that Bostonians are able to continue moving throughout the City. Many coastal transportation corridors are crucial for residents commuting to school or work, and serve as primary evacuation routes during emergencies. For these reasons, Boston Harbor Now supports the City's preferred alignment in East Boston for a waterside alignment (EB2) next to Route 1A. In addition, the Final Report must detail how Dorchester alignments coordinate with parallel planning projects to protect critical transportation infrastructure like Morrissey Boulevard, the MBTA Commuter Rail, and Red Line. The Final Report should also detail how construction of CSRM infrastructure interacts with the many tunnels throughout Boston's coastline. Given that most public transportation and commuting corridors extend outside of Boston into other municipalities, we urge the USACE team to coordinate with neighboring cities and regional planning processes to ensure future projects integrate together.

4. Value of recreational amenities

In Boston, our coastal recreation spaces are irreplaceable and limited resources integral to the health and wellbeing of our City. These resources need to be adapted and protected, and CSRM planning should account for the local context of each of these spaces. In some contexts, coastal open spaces can serve as floodable hybrid infrastructure that can be adapted to absorb, store, and redirect coastal flooding. In neighborhoods with limited access to open space, we should consider perimeter defenses to protect these fields, beaches, and parks. This will ensure that all neighborhoods, and particularly our most socioeconomically vulnerable populations, have access to viable recreation areas in the future. We recommend that alignments in the Final Report be updated to protect the Charlestown High School's Athletic Fields (CH3), Tenean Beach (DOR3), and the open space at 102-124 Border Street (EB3A). These adjusted alignments directly respond to years of Climate Ready Boston engagement, and will help ensure public acceptability for implementing projects.

5. Maximizing continuous perimeter coverage

In neighborhoods where USACE proposes alternate versions of waterside perimeter protections, Boston Harbor Now supports the more extensive alignments. The DT3 Downtown alignment is essential for protecting the Boston Harborwalk, water



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transportation infrastructure at Long Wharf, and key waterfront sites such as Columbus Park and the New England Aquarium. We support SB3 as the comprehensive South Boston alternative, while recognizing that individual alignments within SB3 will require substantial coordination and refinement with Massport, DPA property owners, and tenants to maintain viable water-dependent industrial operations and direct waterside access.

Opportunities for Inclusion in the Final Report

The following section includes topics and focus areas we hope will be included and/or further elucidated in the Final Report:

- We strongly recommend that USACE initiate their stated consultation protocols outlined in the USACE Civil Works Tribal Consultation Policy, and Executive Order 13175 “Consultation and Coordination With Indian Tribal Governments” (2000). Before finalizing the Boston CSRM, it is crucial that USACE works with Tribal Historic Preservation Offices, the North American Indian Center of Boston (NAICOB), and the Indigenous Peoples Partnership Coordinator of the First Peoples First Stewards Partnership Program within the Massachusetts Department of Conservation and Recreation.
- According to the Draft Report, “this study did not look at outer harbor island restoration as a CSRM feature to reduce impacts of surge on the shoreline” (p.107). The Boston Harbor Islands are eroding though, as indicated in several studies by USGS, the City of Boston, and others. The islands are a thriving ecosystem, but also help reduce wave energy and storm surge that affects the mainland, so it is important to consider how the erosion on the islands could affect the performance of alignments in the study. Boston Harbor Now is working on a climate resilience plan for the Harbor Islands, and looks forward to further coordination with USACE and the City of Boston related to the islands.
 - In addition, the cultural resources on the Boston Harbor Islands should be considered and prioritized based on the significant Indigenous history and artifacts present throughout the Boston Harbor Islands National and State Park.
- We are concerned about the potential interaction between the proposed alignments and stormwater flooding. It is important to ensure this coastal flood protection infrastructure does not inadvertently create a bathtub that keeps stormwater in.
 - In addition to stormwater considerations, proposed CSRM infrastructure should be aligned in a way that does not preclude future adaptation to other utilities.



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- In the Final Report, USACE should coordinate with the Navy and National Park Service around their resilience planning for the federally owned portion of the Charlestown Navy Yard.
- The Final Report should further explain how implementation of Action Plan 2 will interact with state and local regulations. Boston Harbor Now has continually advocated for more consolidated and streamlined permitting processes for resilience projects, and we have a strong knowledge base and willingness to support USACE through these processes.
- The Final Report should explain the basis for USACE's proposed alignment design elevations and how they compare with the 12–16 ft NAVD88 Design Flood Elevations identified in Climate Ready Boston plans, including differences in sea-level-rise assumptions, design horizons, levels of risk reduction, and freeboard.
- Along Fort Point Channel, we are concerned about the lack of alignments along the south side of the Channel, where there are significant flood pathways. While we support the proposed storm surge barrier at the mouth of the channel, it is not clear whether that barrier alone will provide the needed CSRM for the neighborhoods surrounding the Channel, and additional elevation of the Channel's edges should be considered alongside the storm surge barrier.

Working Waterfront and Water Transportation

The Final Report must consider how coastal adaptations will ensure the viability of current maritime industries and allow for the integration of a water transportation network, including but not limited to an expanded green ferry system connecting communities across the region. The Final Report should highlight how current and future ferry and cargo vessels berthing and docking points tie into the proposed alignments. Boston Harbor's maritime industries and water transportation systems are a vital component of the Massachusetts economy and play a significant role in the New England region's economic well-being.

To protect existing maritime operations and ensure future growth of this economic resource, the Commonwealth created 10 Designated Port Areas (DPAs) along the Massachusetts coast. The Commonwealth identified these areas as being well-suited for maritime industry water-dependent uses for several reasons, such as their proximity to the waterfront, access to navigable waterways, and the availability of or potential for suitable waterfront infrastructure. Boston Harbor property within the City of Boston's jurisdiction includes DPAs located in South Boston, East Boston, and along the Mystic River and Chelsea Creek, and also includes other working waterfront property along Boston Harbor that has not been formally designated as DPA land.



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As USACE finalizes its alignments and implementation roadmap for Action Plan 2, it is important to ensure that there are real opportunities for understanding both the operations and challenges faced by maritime industries, and the impacts of resilience projects. The Final Report should consider existing DPA sites where such operations are occurring as well as currently-vacant DPA sites to ensure those areas are viable for future water-dependent maritime industrial use. To best understand the needs of the maritime industry and working port stakeholders, we strongly recommend that USACE employ the expertise of the maritime and port communities when considering new resiliency projects for DPA locations. We also ask USACE to consider the overlap of ports and infrastructure as it considers coastal typology and measures. It is important to recognize the need to consider non-CSR infrastructure when evaluating resiliency of maritime industrial areas. Working port areas need reliable infrastructure (e.g. roads, electricity, potential rail connections) to operate effectively.

Lastly, we recommend that any proposed resiliency projects located near or on DPA sites be consistent with and do not contravene the findings of the Commonwealth's 2025 ResilientCoasts plan, as those findings relate to the maritime industry, DPAs and working ports. Some of the Commonwealth's key findings included:

*“Working waterfronts often overlap with other coastal typologies - most often coastal floodplain - but may require different coastal resiliency measures to meet the physical and operational needs of water-dependent uses. For example, elevating roads and buildings may compromise the land-water connection that is critical to port operations. Elevating critical systems like emergency generators and dry or wet flood proofing facilities may be a more cost-effective option in these areas. However, for some port uses, critical equipment or inventory may need to be permanently or temporarily relocated creating logistical challenges and expense... **Communities should consider and avoid resilience measures that negatively impact the operations of ports, making them less viable. (bold emphasis added)** For example, making upgrades or improvements to roadways may be essential both for the surrounding community and to maintain access in and out of the port. However, failing to take into consideration the unique needs of the [working] port in this process could unintentionally restrict truck access, negatively impacting port operations.”*

Conclusion

We commend the Project Team for their detailed analysis of Boston's vulnerability to sea level change and coastal storms. In particular, we appreciate the Project Team's goal of building off the past 10+ years of Climate Ready Boston planning, engagement, and design. Since the beginning of this collaboration between the City of Boston and USACE, we have been impressed with the neighborhood level planning and

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collaborative spirit that Jeffrey Herzog and the USACE team have brought to the study. We know that Boston will need to partner with USACE to lay out a multi-year roadmap for shovels-in-ground implementation of these coastal protection projects, and we look forward to supporting each future phase of that process. Thank you for your consideration.

Sincerely,

Kathy Abbott

President & CEO, Boston Harbor Now

Joe Christo

Chief Resilience Officer, Boston Harbor Now and Stone Living Lab

cc: Jeffrey Herzog, Kathryn Roosa, Governor Maura Healey, Lieutenant Governor Kim Driscoll, Secretary Rebecca Tepper, Mayor Michelle Wu, Federal Congressional Delegation, State Senate President Karen Spilka and Speaker of the House Ronald Mariano, UMass President Marty Meehan and Chancellor Marcelo Suárez-Orozco