*City of Boston, Massachusetts*
*Office of the Mayor*
**Michelle Wu**

Mr. Todd Randall
U.S. Army Corps of Engineers, New England District
ATTN: COB CSRM Project Team
696 Virginia Road
Concord, MA 01742-2751

September 15, 2026

Dear Mr. Randall,

As the Non-Federal Sponsor (NFS) for the Boston Coastal Storm Risk Management (CSRM) study, we present the following comments as we continue to work towards our Final Feasibility Study. We appreciate the opportunity to share our thoughts with the U.S. Army Corps of Engineers (USACE).

Since we released our first Climate Ready Boston report in 2016, the City of Boston has engaged with thousands of Bostonians to prepare for the design and construction of our coastal adaptation measures. We appreciate USACE's dedication to continuing that public engagement through the development of this Draft Integrated Feasibility Report and Programmatic Environmental Assessment.

This letter covers where we're aligned with USACE's Draft Integrated Feasibility Report, where we want this partnership to go, and where we think policy and practice need to improve as we move toward implementation of USACE's Comprehensive Action Plan—Action Plan 2, and Early Action Element—Action Plan 3 - Moakley Park.

***Boston needs action and Federal investment.***

We affirm the Draft Integrated Feasibility Report definitions and assessment of coastal flood risk.

We affirm your findings that we will see at least 42 inches of sea level rise over the course of the next century, and we believe that with increasing frequency of storms, we will see the magnitude of flooding compound from what we have experienced during recent Storms of Record in 2018, 2022, and 2023. The risk assessment in the USACE Draft Integrated Feasibility Study reflects our Climate Ready Boston and Massachusetts Coastal Flood Risk Model results.

We affirm your findings that we will see at least $54 billion in economic losses between 2040 and 2090 if no action is taken—a figure we believe is conservative given it doesn't fully capture Other Social Effects (OSE) and Regional Economic Development (RED) benefits. We appreciate that the scope of our Study included the municipal boundary of Boston, but we want to underscore that this work is important to all of Greater Boston and the Commonwealth, not just coastal neighborhoods. Flooding could compromise access to hospitals, the MBTA, I-93, the Mass Pike, Logan Airport, and more. Building coastal infrastructure will also protect places further inland in Dorchester, Roxbury, the South End, Back Bay, Beacon Hill, East Boston, Charlestown, Allston, and Brighton.

We affirm the Benefit-Cost analysis that proposes projects whose benefits likely exceed costs. And we believe that boosts to tourism, the environment, and economic development (all of which the National Economic Development plan account do not take into consideration) will further increase the comprehensive benefits of the proposed projects. The case for investment in

Boston is clear: $4 back for every $1 spent is one of the best investments government can make—and a tremendous case for federal investment in our city.

Considering the many costs of inaction, we agree with the USACE Boston CSRM report findings: Action Plan 1 - No Action is not a viable option for Boston.

***Boston is already building coastal infrastructure***

We are already implementing coastal flood protections. Over the course of the last 10 years, we **have invested over $48M in coastal resilience infrastructure,** including at Martin's Park (South Boston, June 2019), Langone Park and Puopolo Playground (North End, February 2021), McConnell Playground (Dorchester, July 2022), and Piers Park II (East Boston, October 2022, Massport).

**We are actively investing $32M** across Ryan Playground (Charlestown, expected completion 2027), interim deployable projects (Main Street, Charlestown; Mary Ellen Welch Greenway, East Boston; Martin's Park, South Boston), and Raymond L. Flynn Marine Park (South Boston).

**Over the next five years, we will spend $59M** to design projects in East Boston (Border Street and Mario Umana Academy, Lewis Mall, and Carlton Wharf), Charlestown (Barry Playground, Charlestown Navy Yard and Little Mystic Channel), South Boston (BWSC Fort Point Channel Storm Surge Barrier Conceptual Study, Moakley Connectors, Moakley Park), and Downtown (Christopher Columbus Park and Long Wharf).

In addition to the $139M committed or completed to date, **the City has established a $75M Coastal Capital Reserve** that will be used to provide matching funds as needed for state, federal, or other grant programs. With over $200M dedicated to coastal resilience, we are well underway on our decades of implementation.

We understand the significant financial commitment required to work with USACE. Assuming the $10B total cost estimate in the Draft Report, we understand that preparation for the non-federal 35% match, or at least $3.5B, will be necessary to move projects to design and construction. We are exploring every local, state, and regional opportunity to acquire this funding.

The Boston Green Ribbon Commission is actively developing a Coastal Resilience Financing Blueprint to assist with the identification of a full range of funding mechanisms available to support these projects going forward. We are also proactively convening state stakeholders to develop a shared strategic capital plan. We anticipate sharing the responsibility for this match across the state agencies whose land the projects would protect—including the Department of Conservation and Recreation, MassDOT, the MBTA, and Massport.

We look forward to delivering solutions that protect our neighborhoods, critical infrastructure, and economy for decades to come, in partnership with USACE.

***We Need Both: Action Plan 2 and Action Plan 3***

We agree that Action Plan 3 is our Early Action Project, as Moakley Park sits in one of Boston's most flood-vulnerable and historically underinvested neighborhoods. It's also the only project in this Study advancing to 35% design ahead of the Water Resources and Development Act (WRDA) 2028 deadline. A City-led design with state land ownership in the mix, this project has the potential to be a model for every Boston CSRM project to come.

But Moakley Park alone doesn't manage our Citywide risk at the scale of the $54 billion exposure cited above. Action Plan 3 protects one neighborhood from one flood pathway. Action Plan 2 closes critical flood pathway gaps across our 47-mile coastline.

We need both, in sequence: Action Plan 3 to prove the process, Action Plan 2 to protect the city. Below, please find the City's preferred alignment alternatives for the Action Plan 2 - Comprehensive Plan:

- **Charlestown:**
    - **We prefer CH3A over CH3.** We prefer CH3A for a full perimeter solution from Charlestown Navy Yard through Little Mystic Channel, and we advocate for extending the structural alignment to protect the Charlestown Community Center. As a critical emergency shelter, the Community Center provides an essential service for a neighborhood connected by bridges. For Charlestown to remain self-sufficient during a coastal storm, we must be able drive emergency vehicles in and around the Community Center parking lots. We also support CH3A over CH3 because of the additional option to include non-structural consideration for distinct areas excluded from the structural protection that facilitate National Economic Development movement of goods and services provided in Autoport—whether it's the delivery of freight for distribution or the servicing of ferry boats for transportation. The alternative CH2 excludes hundreds of properties within Charlestown Navy Yard and leaves Chelsea Street, a critical roadway, vulnerable to flooding for evacuation and emergency service access.
    - **We need additional information about how to support areas with residual flood risk**. Piers, Constitution Wharf, Autoport, and the MBTA Sullivan Square Bus Yard are considered residual risk as part of Action Plan 2. In order to provide funding support and guidance for individual properties, we seek guidance from USACE on next steps to implement a Boston non-structural program. We encourage USACE to consider how the future of the USACE non-structural program could evolve through partnership with non-Federal Sponsors interested in addressing residual risk.

- **Dorchester:**
    - **<u>We agree with DOR1 (Moakley Park, Action Plan 3: Early Action Element), DOR2, DOR3, DOR4, and DOR6.</u>** We affirm that the current proposed project locations are accurate and closely reflect alignment decisions from the Coastal Resilient Solutions Dorchester report and community findings. We expect community engagement and stakeholder collaboration to continue into the design process, ensuring that final designs meet community needs and combined benefit goals.
    - **<u>We need additional information about how to support areas with residual flood risk</u>**. Properties along the Neponset River coastline, in Port Norfolk, and around Savin Hill, are considered residual risk under Action Plan 2. In order to provide funding support and guidance for individual properties, we seek guidance from USACE on next steps to implement a Boston non-structural program. The City is currently executing a pilot Home Flood Assessment and Elevation Certificate program for the Port Norfolk neighborhood to investigate which types of non-structural approaches exist in a typical Boston neighborhood. By learning more about the range of recommended actions (including conceptual cost estimate ranges), we plan to develop next steps and recommendations for an efficient and effective pilot non-structural program.
- **Downtown/North End:**
    - **<u>We prefer DT3, not DT3A.</u>** DT3A includes a roadway closure across Commercial Street at Sargent's Wharf, which would close a critical neighborhood evacuation route for the North End. The neighborhood has many narrow, winding streets which make vehicle evacuation difficult, so keeping open all available thoroughfares for emergency vehicles and community evacuation is critical during future flooding events. DT3, continuing the line of protection waterside up to Battery and Burroughs Wharves, is the City-preferred alternative.

- **East Boston:**
    - **<u>We prefer EB2, not EB2A.</u>** USACE states EB2A, the floodwall in the median of Route 1A, has "a permanent effect on safety, although it is insignificant" because only half of Route 1A will be usable during storm events. We believe this alternative will dramatically increase bottlenecks during planned evacuations and double evacuation times through critical roadways in East Boston (westbound through Callahan Tunnel or Ted Williams Tunnel). We propose USACE prepare a frequency analysis, possibly using the Gate Opening Analysis Tool (GOAT), to understand the number of expected road closures that would be considered under the Federal Alternative. Ultimately, we would prefer the Chelsea Creek alternative (EB2), which brings flood protection to the coastline and protects all lanes of Route 1A in addition to the businesses along the corridor.
    - **<u>We support EB3A with modifications.</u>** We support a fully waterside alignment along the Border Street and New Street waterfront, in line with the preferred strategy that is currently being designed in partnership with private property owners as part of the Resilient Border Street Waterfront Project. We do not support the interior floodwall along the southern portion of Border Street and New Street. This alignment would disrupt site access, leave waterfront properties unprotected from coastal flooding, negatively affect the public realm, and preclude future redevelopment of these sites. The cost savings associated with a potentially shorter alignment would be reduced by the complexity of designing the sub-grade wall foundation around in-road utilities, whereas existing coastal infrastructure could be repaired and raised with less disruption. We respectfully disagree with USACE's position that this alignment would minimize impacts to the Designated Port Area (DPA) and historic resources, as the DPA does not preclude coastal resilience infrastructure improvements, and impacts to historic resources can be mitigated. The City therefore recommends removing the interior floodwall on Border Street and New Street from the preferred alignment and integrating the correct version of the City's waterside alignment.

- **<u>We request additional information about how to support areas with residual flood risk</u>**. East Boston's Eagle Hill, Wood Island, and clusters of other homes across the neighborhood are considered at residual risk under Action Plan 2. In order to provide funding support and guidance for individual properties, we seek guidance from USACE on next steps to implement a Boston non-structural program. Building off the pilot project already underway in Dorchester's Port Norfolk neighborhood, we hope to act as a proactive non-Federal sponsor to efficiently implement a non-structural program with USACE.

- **South Boston:**
  - **<u>We prefer SB3, not SB2</u>.** SB2 does not include our Raymond L. Flynn Marine Park resilience recommendations—namely a comprehensive perimeter solution that encompasses maritime and industrial activity. Tenants near the park include from seafood processors, motor freight facilities, life sciences labs, green tech companies, and other research and development tenants. Because of the park's proximity to deep draft navigation channels (40-foot deep berthing), federally designated freight corridors including the South Boston bypass road, and potential rail connections, we believe that SB3 provides the most comprehensive protection of the RLFMP's diverse range of benefits to the national economy, with a Benefit-Cost Ratio of 1.5. While USACE calculated the Benefit-Cost Ratios to be close (within 0.1 of each other), we believe there may be some undercounted benefits to protecting critical freight corridors and location-based industries such as fish processing.
  - **<u>We need to coordinate early on Fort Point Channel Storm Surge Barrier Planning.</u>** The Boston Water and Sewer Commission is advancing next steps of conceptual level design for the stormwater components of the storm surge barrier at the mouth of the Fort Point Channel. To match this effort, we request support from USACE on how to approach tangible next steps for integrating ongoing channel edge projects—connecting the surge barrier with the Boston Children's Museum's ongoing resilience improvements and city-led projects like interim deployables and Resilient Fort Point Channel efforts. Understanding overall

Action Plan 2: Comprehensive System roadmapping will help us plan near-term work that will enable long-term implementation.

- **We need additional information on how to support areas with residual flood risk.** Properties along Day Boulevard and Massport's Conley Terminal are considered at residual risk under Action Plan 2. In order to provide funding support and guidance for individual properties, we seek guidance from USACE on next steps to implement a Boston non-structural program.

Together, Action Plan 2: Comprehensive Plan and Action Plan 3: Moakley Park Early Action Element best serve the needs of our Boston coastal flood risk stakeholders. They make the best possible use of the natural resources involved and protect the environment for generations to come. We respectfully request USACE commit to a process and timeline for authorizing the remaining Action Plan 2 projects beyond 10% design and putting separable elements on a pathway for future Water Resource Development Act (WRDA) appropriation cycles.

***Commitment to Funding and Streamlining***

We commit to using all available avenues from USACE and non-Federal cost-sharing, to state and local funding, to innovative partnership funding, to new sources of funding that may become available over our implementation time horizon—to ensure the consistent delivery of USACE-compatible 35% Engineering Feasibility designs.

To demonstrate this commitment, we have proactively submitted our Letter of Interest in pursuing the next increment of study (under a USACE 3x3 effort), to begin our workplan with USACE New England District.

We also intend to pursue other cost sharing vehicles for City-led projects such as WRDA 1986 Section 203, a pathway other major non-federal sponsors are pursuing in parallel. And we will work across our waterfront to pursue opportunities to bring projects from Recommended Plan to Authorization and Appropriation.

We also recognize that while capital for design and construction is the first hurdle, sustaining our long-term Operations and Maintenance responsibilities is critical to protecting our shared investment. We expect that over the coming months, we can proactively begin this conversation rather than waiting until after the Final Feasibility Report and Chief's Report milestone.

***Commitment to Hybrid Infrastructure***

We are dedicated to becoming a leader in hybrid infrastructure solutions that blend with natural systems. The plan mostly proposes building with stone and concrete. There are few plans for wetlands, living shorelines, or fixes for increased stormwater flooding. The City wants clearer answers on where those options fit in and who pays for them.

We believe that as part of full project design and implementation, we can help USACE incorporate more demonstration and pilot projects that increase natural and nature based features alongside our Hybrid Infrastructure design. We expect at a minimum for all of our projects to maintain the current definitions of USACE hybrid infrastructure.

***Advocacy for Integration with Stormwater***

We will continue to advocate for more federally-eligible funding for drainage projects which support the mission and interest of the federal coastal projects. Coastal storm risk mitigation and drainage aren't separable problems, and we believe a successful coastal risk management plan accounts for coastal and stormwater risks. We understand the limitations of current USACE policy regarding the use of federally-eligible funds for stormwater utility integration, but we believe our project scopes can account for this. We look forward to continuing our work with USACE to optimize project integration and move towards a more cohesive policy approach.

***Advocacy for Non-Structural Program Innovation***

We believe that non-structural program interventions do have a place as part of the Comprehensive Action Plan for the City of Boston, and several areas within Boston remain outside of a structural protection limit based on a "fringe flooding" assessment or for cost optimization. However, we would like USACE to consider Boston for next-generation non-structural implementation support, increasing the capacity of USACE to deliver personalized parcel solutions by partnering with the NFS to implement structural assessment and elevation programs.

We value the dedication and professionalism of the USACE Boston CSRM team from our Project Delivery Team through our entire Vertical Team. Your dedication to supporting Boston's efforts to protect current and future generations from coastal storm risk is appreciated.

We have additional technical, editorial, and content revisions that we will continue to share with your team over the next six months as we develop our Final Feasibility Report and Early Action Element submission package for Moakley Park. You can expect to coordinate directly with our Office of Climate Resilience designated project lead, Kate Roosa (kathryn.roosa@boston.gov).

We appreciate your leadership and are looking forward to the next steps together.

Sincerely,

Michelle Wu

Michelle Wu
Mayor of Boston