



Building a better neighborhood together

September 18, 2026

Mr. Todd Randall
U.S. Army Corps of Engineers, New England District
ATTN: Jeff Herzog; Kate Harson
696 Virginia Road Concord, MA

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

Re: Draft Boston Coastal Storm Risk Management Integrated Feasibility Report

Dear USACE Boston Coastal Storm Risk Management Study Team,

Thank you for the opportunity to comment on the draft US Army Corp of Engineer's Boston Coastal Storm Risk Management Integrated Feasibility Report.

FPNA is the local neighborhood association representing Fort Point and parts of the South Boston Waterfront. Our involvement in climate and coastal resilience began in 2017 with Climate Ready South Boston and has continued to evolve through the Resilient Fort Point Channel Infrastructure Project, developed as part of the FEMA pre-disaster grant application. Our resiliency advocacy has encompassed City of Boston Article 80 large development projects at 5 and 15 Necco Street, 244–284 A Street, 232 A Street, and now includes the Gillette Redevelopment Master Planning, the Reserved Channel and the City of Boston's interim 2030 Resilient Fort Point Channel Infrastructure work.

Like many Boston waterfront neighborhoods, Fort Point experienced a wake-up call in 2018, when flooding made it clear that sea level rise is no longer a distant concern. Since then, Fort Point has continued to experience flooding during astronomically high tides, underscoring the urgency of moving beyond planning to a coordinated, funded and implementable coastal resilience strategy.

FPNA recognizes the critical importance of protecting Boston's waterfront from coastal flooding and the significant opportunity of the U.S. Army Corps of Engineers' Coastal Storm Risk Management (CSRM) Feasibility Study, developed in partnership with the City of Boston, to provide a comprehensive framework that will also position the City to secure necessary federal investment.

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The scale of this effort must be a full comprehensive plan (Action Plan 2) to provide the framework and roadmap for future actions (at minimum reaching 35% design) while helping secure the maximum federal authorization and funding for Boston's coastal resilience needs. Although we recognize the Moakley design (Action 3) is more advanced, the priority of other resilient projects needs to be equitably decided and sequenced according to greatest risk and greatest protection of neighborhoods, cultural and historic assets, the economy, health and recreational benefits of public waterfront access, including the importance of open and green spaces to the people of Boston in the evaluation of final design options.

We believe that the experience and perspectives of waterfront neighborhoods must be an integral part of shaping the study's recommendations and ultimately the design and implementation of Boston's coastal resilience infrastructure. In that vein, we will primarily focus our comments on Fort Point and the Fort Point Channel.

With the denial of the Resilient Fort Point Channel Infrastructure grant, questions remain about the level of protection that can ultimately be achieved in Fort Point. We applaud the City of Boston for moving forward with its interim 2030 Resilient Fort Point Channel Infrastructure work and recognize the importance of these near-term investments.

However, the City's approved flood protection for future private developments was given with the expectation that it would be complemented by the berm and other resilient infrastructure included in the FEMA pre-disaster engineering design. Without these additional interventions, it is unclear whether private property protections will provide the level of protection originally envisioned or leave gaps in the overall system. We urge USACE to specifically evaluate these potential gaps, identify the public infrastructure needed to connect and complete the private-property protections, and incorporate those improvements into the CSRM action plan and funding strategy.

FPNA commends the Boston Water and Sewer Commission for recommending a Fort Point Channel storm surge barrier and the U.S. Army Corps of Engineers for recognizing its value and incorporating the barrier into the CSRM plan.

Prioritizing the Fort Point Channel storm surge barrier is critical to Boston's broader coastal resilience strategy. A barrier at this location has the potential to provide significant protection not only to properties immediately along the Fort Point Channel, but also to communities and infrastructure further inland and extending to West Broadway, Roxbury, and Dorchester.

The barrier should therefore be viewed as a foundational component of a connected, district-wide resilience system, rather than as an isolated infrastructure project. Its design, alignment, timing, and connections to shoreline protection must be carefully coordinated with existing and planned resilience measures to contribute to a

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comprehensive, invested system capable of protecting Boston as sea levels continue to rise and extreme weather events intensify.

Given its potential regional benefits, we urge USACE and the City to maintain the Fort Point Channel storm surge barrier as a high priority and to advance the planning, funding, and implementation necessary to make this critical component of Boston's long-term coastal resilience strategy a reality.

We support the City of Boston's preference for SB3, which provides protection for Raymond L. Flynn Marine Park, fortifies water dependent industrial uses, limits flood exposure in the adjacent Seaport, and helps reduce flood pathways into Fort Point. This approach recognizes the interconnected nature of Boston's waterfront and the importance of addressing flood risk across neighborhood uses and boundaries.

As longstanding waterfront advocates, FPNA believes that the requirements and public-access principles of Massachusetts General Law Chapter 91, the Public Waterfront Act, must be fundamental to the planning and design of Boston's coastal resilience infrastructure. Protecting the waterfront from flooding cannot come at the expense of the public's ability to access, experience, and enjoy the waterfront. A continuous, connected, and elevated Harborwalk should be treated as essential components of the resilience system. For example, at the Hook site along Fort Point Channel, FPNA agrees with our Wharf District neighbors in supporting an elevated perimeter protection system along the water's edge that connects directly with the future storm surge barrier.

Overall, FPNA endorses a layered, hybrid approach combining natural and nature-based protections with gray infrastructure while maintaining and enhancing public access to the waterfront. This approach reflects what our community has consistently supported throughout Boston's Climate Ready planning and what we expect the USACE CSRM plan to build upon. While we understand that USACE may not be able to fund all of the betterments identified in the Climate Ready Boston plans, berms and floodwalls should be designed and constructed to serve as the foundation for an elevated, continuous Harborwalk and for other future public green space and amenities.

Fort Point has been engaged in this work for years, and we intend to remain actively engaged as the CSRM recommendations move from study to design, funding, and implementation. The decisions made through this process will shape Boston's waterfront for generations. Taking no action is not an option. We look forward to working with USACE and the City of Boston to get this right.

Respectfully Submitted,

Tom Ready

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cc:

Stephen Lynch - US Congress, 8th District of Massachusetts

Nick Collins - Massachusetts State Senate, 1st Suffolk District

David Biele - Massachusetts House of Representatives, 4th Suffolk District

Ed Flynn - District 2 Boston City Councilor

Jeffrey A. Herzog - Program Manager, U.S. Army Corps of Engineers

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Office of Climate Resilience

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