

September 18, 2026

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

Re: Draft Integrated Feasibility Study with Programmatic Environmental Assessment for the Boston Coastal Storm Risk Management (CSRM) Study

Dear Mr. Randall:

My comments below are submitted for today's deadline regarding the Draft Integrated Feasibility Study with Programmatic Environmental Assessment for the Boston Coastal Storm Risk Management (CSRM) Study, hereinafter ("Draft Feasibility Study").

For background, as it relates to the Draft Feasibility Study and any future contact if needed:

I am a 36-year resident of South Boston; a community advocate in the planning of the Seaport (1997-2008, SAND co-founder and spokesperson¹, and a community representative in "Inundation District" a feature film by Pulitzer Prize winning reporter/filmmaker David Abel². Since 1997, I have been deeply engaged as an advocate in the permitting of ~20 million square feet of new development on the South Boston Waterfront, ~10 million square feet completed as of 2026.

I've worked collaboratively on roughly a dozen municipal and state planning efforts dating back to the South Boston Waterfront - Seaport Public Realm Plan (City of Boston, 1997), Municipal Harbor Plan (MA-EOEA, 2000) and Watersheet Activation Plan (City of Boston 2003).

I've served on a mayoral-appointed advisory committees including the City of Boston / BRA Fort Point 100 Acres Plan Advisory Committee. The 100 Acres Plan was a successful effort to rezone approximately 100 acres of Fort Point land formerly owned by Boston Wharf Co. (later Gillette), USPS and a group of smaller landowners.

I served as "Spokesperson for the Petitioners" in our community's successful petitioning for a historic landmark district designation for Fort Point district (2001) through the Boston Landmarks Commission, authoring the history of Fort Point for consideration by Mayor Menino with the petition.³ Following the initial petitioning effort, I served on the mayoral-appointed Study Committee (circa 2007-2008) drafting guidelines for the proposed Fort Point Channel Landmark District (FPCLD). The FPCLD designation of Fort Point as a historic district was achieved in 2009.

The Fort Point district's designation itself protects historic assets that are identified in the Draft Feasibility Study as "cultural resources."

1. <http://www.seaportalliance.org>

2. <https://www.inundationdistrict.com>

3. Boston's Fort Point District: A Landmark of New England's Industrial and Maritime Past, <http://www.seaportalliance.org/SAND/Archive/021219fphistory.html>

Scope: City of Boston

Without qualification, I support the recommendations of the City of Boston's climate team in its comment letter of September 15, 2026, signed by Mayor Michelle Wu. Under Mayor Wu, Boston's climate team has excelled in planning for impacts of climate change, as well as in taking steps necessary to protect Boston's coastline from inundation and other impacts of climate change over a shorter time horizon.

I also support, without qualification, the recommendations of the Boston Water and Sewer Commission (BWSC). BWSC has also been leading, not only in planning, but in action. I particularly commend the work of BWSC on the its Northern Ave Storm Surge Barrier concept (now part of the USACE effort), as well as in its progress using tools to recognize combined impacts of stormwater and sea level rise.

Without qualification, I support the City of Boston climate team's assessment regarding the Draft Feasibility Study, including the City of Boston's recommended Action Plan: **ES-4 Full System Comprehensive Plan (CSP) (Action Plan 2)**. The City of Boston's arguments are well-founded.

Regarding the Storm Surge Barrier at Northern Avenue

I fully support the City of Boston / BWSC's ongoing work toward implementation of a storm surge barrier at Northern Avenue, and am encouraged by USACE's considerable work in consideration of this project. This storm surge barrier would both protect coastal land (including my own neighborhood) and could provide storage for up to 10% of the City's stormwater runoff.

Based on my review of the Feasibility Study Draft, **I encourage USACE to embark on a comprehensive study of economic benefit of the storm surge barrier, including a more robust inventory of assets that would be protected by it.**

Such a comprehensive study would:

1. Assist the Commonwealth and City of Boston in prioritizing funding required to match USACE funding, based on the limited City and State funding sources anticipated.
2. Help accelerate work on an alternative protection plan for areas and assets along the Fort Point Channel coastline that will be at risk of inundation from the Fort Point Channel if the surge barrier proves not to be an economically viable option.

With a more comprehensive analysis of the economic benefit of the storm surge barrier by USACE, the Commonwealth and City of Boston's prioritization of funding decisions can be balanced against countervailing forces and interests.

Scope: South Boston, Moakley Park and the Raymond L. Flynn Marine Park (RLFMP)

I support SB3, with a BCR of 1.5, only a marginal reduction in economic benefit from SB2, with a BCR of 1.6. SB3 adds protection of the RLFMP.

Furthermore, I support the City of Boston's recommendations regarding Moakley Park (Early Action Element – Action Plan 3).

The Draft Feasibility Study does not, in my view, accurately assess *existing* assets within the Marine Park. As one example, the Draft Feasibility Study states (Page 132), “More than 3000 people are employed in the 191-acre Marine Park area and much of that employment is in industries that are difficult to move elsewhere.”

The “more than 3,000 people” estimate for Marine Park employees cited in the Draft Feasibility Study calls for additional analysis. As of 2015, over a decade ago, the Marine Park had already employed an estimated 3,500 workers.¹ Between 2015 and 2025, the Marine Park benefited from an \$850 million investment in Conley Terminal²; a \$100 million investment in, tourism resulting from, and new employment related to Cruiseport³; and significant growth its Massport's commercial real estate portfolio (via ground leases). Vertex Pharmaceuticals and other significant commercial tenants have leased space in new towers in the Marine Park. An estimated 5 million square feet of commercial development has been constructed and is projected to be completed, according to the BPDA Raymond L. Flynn Marine Park Master Plan Update (FMPU).⁴

Within the scope of assets in the RLFMP, I encourage USACE to consider the potential for future expansion of Track 61, whether or not potential of Track 61 has been identified by other parties.

I view USACE's role in identifying assets and protecting the Marine Park as extremely critical, primarily because I remain concerned about Massport's inattention to resiliency efforts over the past two decades. In my view, Massport has: failed to provide robust district-wide guidelines for new development; understaffed departments responsible for climate change planning; repeatedly awarded RFPs for new development to climate skeptics; become over-reliant on deployable barriers that will be susceptible to failures resulting from forces of wind and water, greater than anticipated, acting upon them; and more.

As a result of those concerns, in my view the RLFMP lags by at least a decade in terms of where it needs to be in protecting assets within the Marine Park, as well as in identifying appropriate funds necessary to match USACE.

For these reasons, I encourage USACE to support SB3, ensuring that Boston has the protections necessary to meet challenges ahead, with or without Massport's assistance.

1. Officials pondering Marine Industrial Park's future, Jon Chesto, The Boston Globe, 7/13/2015:

<https://www.bostonglobe.com/business/2015/07/13/potential-changes-coming-city-marine-industrial-park/NOPMNfd3klnGfZJvEXG6sN/story.html>

2. <https://www.massport.com/media/newsroom/massport-thanks-multiple-partners-celebrates-completion-major-port-improvements>

3. <https://www.massport.com/media/newsroom/massport-celebrates-record-breaking-cruise-season-announces-100-million-investment>

4. <http://www.bostonplans.org/planning-zoning/planning-initiatives/raymond-l-flynn-marine-park-master-plan-update>

Scope: Fort Point

My comments on the Draft Feasibility Study with respect to Fort Point are limited to the following:

I remain concerned regarding:

1. Inundation from Fort Point Channel at Necco Court, a known flood pathway that has lagged others with respect to long-range solutions, and may require special attention.
2. Inundation of Fort Point from points north and east, particularly from floodwater arriving from the Reserve Channel and Boston Harbor via the Marine Park.
3. Reduction in public access to Boston's waterfront. We have seen an unfortunate trend towards approval of large projects that will eventually privatize existing public spaces, as pathways leading to these public spaces become inundated and are no longer accessible.
4. Reduction in public access to, and physical specifications of, Boston's Harborwalk. This concern extends to a future alternative Harborwalk following the anticipated inundation of the existing Harborwalk.

I strongly encourage USACE to consider solutions that employ nature-based solutions. However, given the challenging funding environment, I encourage USACE to be deliberative in terms of deployment of resources (including funding) to serve the main objective: **Providing (and funding), at least, the necessary protections across the entire scope of the USACE plan.** Boston requires a comprehensive set of solutions, and the entire region depends on Boston's success.

Looking beyond USACE's Draft Feasibility Study

I believe the City of Boston will require projects and funding that extend well beyond the scope of USACE's proposed solutions.

As I understand, the City of Boston estimates assets that would not be protected under the USACE plan, even upon completion of Action Plan 2, to be valued at \$13 billion. Accordingly, I would support an expansion of Action Plan 2 to incorporate any protections deemed critically necessary by the City of Boston.

I support a number of the City of Boston's objectives that extend beyond the scope of the USACE Draft Integrated Feasibility Study with Programmatic Environmental Assessment. This letter is intentionally limited to consider what is possible under USACE's capabilities.

I thank you and USACE for this work and collaborative partnership with the City of Boston.

Regards,

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