



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
boston-csfrm@usace.army.mil

Re: A Better City's Comments on the USACE CSRM Feasibility Study Draft for Boston

Dear Mr. Randall,

On behalf of A Better City's nearly 130 member companies and institutions in Greater Boston, thank you for the opportunity to comment on the U.S. Army Corps of Engineers (USACE) Coastal Storm Risk Management (CSRM) Feasibility Study Draft (Draft Study). Our membership reflects the major economic drivers of our region—from hospitals, life sciences, and higher education, to planning, design, engineering, and development, financial and legal services, and cultural institutions. Many of our members own and operate waterfront properties in Boston and have themselves been at the vanguard of coastal resilience. Additionally, several of our members and staff were deeply engaged in the Central Artery/Tunnel Project, known as the Big Dig, and we are committed to driving yet another transformational mega-project for the Boston region.

Building on more than a decade of pioneering planning led by the City of Boston and Commonwealth of Massachusetts, the USACE CSRM analysis is a critical, once-in-a-generation initiative that has the potential to catalyze more than \$10 billion of investment to protect our critical infrastructure, economic hubs, and communities alike. Please consider the following general comments and neighborhood-specific comments as you work to finalize project alignments and next steps.

General Comments

As the economic hub of New England and a national and global leader in the knowledge and innovation economy, investing in Boston's coastal resilience will help to ensure that the region maintains and expands its global competitiveness in sectors like higher education, healthcare, life sciences, robotics and financial services. Boston's global competitiveness across sectors continues to play a large role in establishing and maintaining United States leadership in the global marketplace, a role that must be protected from coastal storm risk. The following recommendations are relevant to all neighborhoods referenced in the Draft.

- 1) **Commit to Action Plan 2, with Action Plan 3 as an Early Intervention, and Support the Comprehensive Plan Recommended by the Non-Federal Sponsor:** A Better City urges the project team to advance Action Plan 2, with Action Plan 3 as an early action intervention of the broader USACE CSRM Plan. Additionally, A Better City fully supports the recommendations of the Non-Federal Sponsor (City of Boston) to advance a more comprehensive plan, including DT3 in Downtown, SB3 in South Boston, the EB2+EB3A in East Boston, DOR1, DOR2, DOR3, DOR4, and DOR6 in Dorchester, and CH3A with modifications in Charlestown, all of which are detailed in the respective neighborhood-specific comments below. The comprehensive plan would provide significant risk reduction benefits to local, state, and federal assets within Boston, including but not limited to MBTA rail transit networks, MassDOT highway infrastructure, and highway tunnel infrastructure along I-90, I-93, and Route 1A.

- 2) **Revisit Accounting for the Draft Study Benefit-Cost Ratio:** A Better City is concerned that the 4:1 benefit-cost ratio may be underestimated and encourages the USACE and Non-Federal Sponsor to revisit the potential benefits provided in the Draft Study. In particular, A Better City recommends ensuring a robust calculation of impacts and potential operational disruption to all critical infrastructure, including all transportation infrastructure; water and wastewater infrastructure; and electric, gas, and telecommunications utilities. Additionally, special care should be taken to quantify impacts to key sectors, including hospitals and community health centers; financial services institutions; cultural institutions; and vulnerable hubs of transport and commerce like Logan Airport, Conley Terminal, the Autoport property in Charlestown, and the Ray Flynn Marine Park and Dry Dock 3 in South Boston. A Better City also urges the USACE to include the Belle Isle Marsh, the City's largest salt marsh, in the benefit-cost analysis modeling given its unique potential to provide future coastal flood protection value, alongside ecosystem services benefits.
- 3) **Maintain 15'NAVD88 Consistency and Adaptability in Flood Protection Barriers:** A Better City urges consistency across flood protection barriers and raising them all to be at 15'NAVD88, instead of enabling discrepancies between 14' NAVD88 and 15' NAVD88 in flood barrier height, as currently proposed in the Draft Study. In addition to having consistency across flood barriers, such base protection levels should also provide adequate foundations and structural integrity to be adaptable and not preclude the City of Boston or other parties from raising the height of such flood protection barriers over time.
- 4) **Integrate Stormwater Management:** A Better City is concerned that stormwater management is excluded from the Draft Study, and that in some cases, the Draft Study's proposed interventions may even preclude needed stormwater interventions led by the Boston Water and Sewer Commission, Wharf District Council, and others. A Better City recommends pursuing a policy waiver to include stormwater management in the project scope and flood inundation modeling for coastal storm risk. At a minimum, A Better City urges that the Draft Study does not preclude future interventions required for coastal resilience in Boston, like stormwater storage tanks, pumps, and drainage, alongside coastal flood protection.
- 5) **Maintain Access to the Harborwalk and Designated Port Areas:** A Better City recommends maintaining access to the Harborwalk and an inclusive, working, and vibrant waterfront to support Boston's economic competitiveness and vitality. Relocated docks and gangplanks in the Draft Study must enable water transit opportunities, alongside existing Harborwalk accessibility and public amenities as mandated by Chapter 91. Designated Port Areas must also be able to maintain operations.
- 6) **Ensure Design is Compatible with Chapter 91, Section 408 (33 USC 408), and Other Permitting Requirements:** A Better City urges the USACE to ensure that the Draft Study design is compatible with the delivery of waterfront accessibility, recreation opportunities, and the provision of public amenities like bathrooms, as required by Chapter 91. A Better City recommends working with the Non-Federal Sponsor proactively to ensure that current Harborwalk provisions of waterfront accessibility, activation and recreation, and public amenities are maintained within the Draft Study. Additionally, the USACE and Non-Federal Sponsor should clarify how Section 408 (33 USC 408) could impact transportation agencies and waterfront landowners, and how such stakeholders may work with the USACE to minimize such impacts.
- 7) **Leverage Nature-Based Solutions:** A Better City recommends integrating nature-based solutions that enable both green and grey flood protection infrastructure. For example, living seawalls like those created by the Stone Living Lab in the Seaport, in addition to breakwaters and floating islands, should be considered alongside grey infrastructure flood barriers whenever possible to provide additional ecosystem services and biodiversity co-benefits alongside coastal flood protection.

- 8) **Include Utility Work in Project Scope and Ensure Coordination with Utilities:** The majority of the proposed project alignments will have a significant impact on underground and at-grade utilities, including gas, electric, telecommunications, water, and sewer infrastructure. It is our understanding that utility relocation and extension work is generally not covered by the federal share but select utility work may count toward the 35% local match, whether funded by the city, state, or a private entity. As we progress to the next phases of design, A Better City urges the USACE to consider a policy exception that allows federal funds to be used to cover critical utility relocation and extension work. A Better City also supports efforts to work with the Massachusetts federal delegation to change the underlying policy, as safe and resilient utilities are critical to our health, safety, and economic prosperity. During the Central Artery/Tunnel Project (aka Big Dig), utility relocation and extension were in part covered by federal funding. Additionally, A Better City strongly recommends establishing a USACE CSRM Utility Working Group to serve as a key point of contact for utility integration. A Better City has experience regarding coordination among utilities that can serve as a model for organizing a similar effort related to utility relocation associated with construction of flood protection barriers. In the early 1990s, the Artery Business Committee, predecessor of A Better City, organized several committees to advise and support the planning, design, and construction of the Big Dig project, with subcommittees established to facilitate communication and to plan for potential interruptions to utility service during construction. A new Utility Working Group could become a key collaborating partner in the design and implementation of the Draft Study for the USACE CSRM mega-project as well.
- 9) **Coordinate with MassDOT, MBTA, and Massport on Coastal Resilience Integration:** The Massachusetts Bay Transportation Authority (MBTA), Massachusetts Department of Transportation (MassDOT), and Massachusetts Port Authority (Massport) are significant stakeholders in various stages of climate resilience across their coastal assets within and adjacent to USACE planned structural elements. A Better City recommends coordinating with the MBTA, MassDOT, and Massport to ensure effective integration and sequencing of USACE-led, Non-Federal Sponsor-led, and state agency-led coastal resilience projects as they relate to the comprehensive plan. If possible, these agencies could identify representatives to serve as liaisons to the aforementioned USACE CSRM Utility Working Group. For Massport property resilience interventions, A Better City recommends referencing Massport's detailed comment letter and technical appendix submitted.
- 10) **Coordinate with State- and City-Led Coastal Resilience Efforts Underway:** A Better City recommends ensuring that the Draft Study integrates with and does not preclude coastal resilience efforts already underway like the State Coastal Zone Management's (CZM) [ResilientCoasts Initiative](#) and [Boston's 2030 Climate Action Plan](#), as well as the State-led [Boston Metropolitan Area Coastal Study](#) looking at regional and cross-jurisdictional resilience. Special care should be taken to address directly adjacent infrastructure assets, including but limited to the New Charles River Dam, which is a federal asset that is operated and maintained in partnership with the Massachusetts Department of Conservation and Recreation. In addition to the Massport letter mentioned above, A Better City recommends referencing and ensuring USACE's Draft Study integrates effectively with any state agency that submitted a letter regarding state-owned properties, including but not limited to the MBTA, MassDOT, CZM, Department of Conservation and Recreation, and the Department of Environmental Protection.



Neighborhood-Specific Comments

The enclosed comments offer more detailed recommendations on the neighborhood plans for Charlestown, Dorchester, Downtown, East Boston, and South Boston. Most critically: expanding flood protection in the Little Mystic Channel; including the Boston Harbor City Cruises/Autoport property; including the Charlestown MBTA Bus Yard Facility; ensuring accessibility to the J.F.K. Memorial Library, Edward M. Kennedy Institute for the United States Senate, Commonwealth Museum, and University of Massachusetts Boston; ensuring maintenance of evacuation corridors via Morrissey Boulevard; modeling impacts to the Central Artery; including the James Hook & Co. Site; pursuing an additional study in East Boston; ensuring Logan Airport accessibility; addressing flood protection gaps at Piers Park; including the fuel terminal at Chelsea Creek; leveraging existing rail infrastructure for flood protection; expanding upon the Fort Point Storm Surge Barrier; expanding benefit-cost modeling for Ray Flynn Marine Park to include industries beyond seafood distribution; and including Conley Terminal in benefit-cost modeling.

The Draft Study is a thoughtful and rigorous analysis that provides a framework for protecting our residents, fortifying our regional economy, and strengthening our nation's economic competitiveness and prosperity. A Better City applauds the USACE and City of Boston for their vision and leadership on this effort and remains ready to partner with city, state, and federal agencies on the advancement of coastal resilience efforts in Boston.

For any questions regarding these comments, please contact Isabella Gambill (igambill@abettercity.org), Tom Nally (tnally@abettercity.org), and Yve Torrie (ytorrie@abettercity.org).

With appreciation,

A handwritten signature in black ink that reads 'Kate Dineen'.

Kate Dineen
President and CEO
A Better City

cc: Mayor Michelle Wu
Chief Brian Swett
Chief Christopher Osgood
Project Manager Kathryn Roosa
Governor Maura Healey
Secretary Rebecca Tepper
Director Alison Brizius

Enclosure: Neighborhood-Specific Comments

Charlestown Neighborhood Plan, in Support of CH3A with Modifications

A Better City prefers CH3A over CH3, due to CHA's more comprehensive perimeter solution from Charlestown Navy Yard into the Little Mystic Channel. However, A Better City is most concerned about the Charlestown Neighborhood Plan's approach to the Little Mystic Channel, one of the primary flood inundation pathways threatening the Charlestown Community Center and surrounding neighborhood. In particular, the Draft Study suggests that a flood barrier alongside the Medford Street side of the Little Mystic Channel would be sufficient to protect the Charlestown Community Center, a critical evacuation shelter. However, the proposed structural interventions for the Little Mystic Channel seem to be cut off at the bleachers of Charlestown High School, which would thereby enable water to flow around the bleachers and continue to inundate the Charlestown Community Center and surrounding neighborhoods. Additionally, the lack of inclusion of the Boston Harbor Cruises/Autoport property leaves significant critical transportation infrastructure and renewable energy infrastructure vulnerable. Finally, A Better City is concerned about the exclusion of the MBTA bus yard facility north of the Alford Street Bridge. A Better City offers the following recommendations to help strengthen the Charlestown Neighborhood Plan:

- **Expanding Flood Protection in the Little Mystic Channel:** A Better City recommends extending the structural flood protection barrier alongside the extent of the Little Mystic Channel, to also include protection of the Channel on the Terminal Street side as well. This would help to protect inundation of the Charlestown Community Center, a designated evacuation shelter, as well as the State Police facility on Terminal Street. Additionally, as one of the primary open and recreational spaces in Charlestown, expanded flood protection to fully protect the Charlestown High School will also help to protect recreational value for the neighborhood.
- **Including the Boston Harbor City Cruises/Autoport Property:** A Better City recommends including the Boston Harbor City Cruises/Autoport property within the Charlestown Neighborhood Plan, to ensure that local transportation access points via Boston Harbor City Cruises and critical infrastructure are not disrupted or damaged. Additionally, as the site is also home to the Massachusetts Clean Energy Center's [Wind Technology Testing Center](#) at 100 Terminal Street, the largest wind turbine blade testing center in North America, added protection to the Autoport site will also help to safeguard renewable energy development and economic competitiveness that Boston provides nationally.
- **Including the Charlestown MBTA Bus Yard Facility:** Given its importance as critical transportation infrastructure, A Better City recommends expanding the Charlestown Neighborhood Plan's Scope to also include the MBTA Sullivan Square Bus Yard Facility north of the Alford Street Bridge.

Dorchester Neighborhood Plan, in Support of DOR1, DOR2, DOR3, DOR4, and DOR6

A Better City supports and appreciates the Dorchester neighborhood plan to help prevent significant loss of life (one of the highest potential modeled loss of life in the Draft Study across all neighborhoods), critical infrastructure, and federal assets. A Better City agrees with DOR1 (Moakley Park, Action Plan 3: Early Action Element), DOR2, DOR3, DOR4, and DOR6. Especially considering the existing flooding of Morrissey Boulevard during king tides and other events, interventions in Dorchester are critical for Boston and the broader region. Given the significance of the federal J.F.K. Memorial Library and Edward M. Kennedy Institute for the United States Senate, and the state UMass Boston and Commonwealth Museum to regional and national interests, A Better City's main question regarding the Dorchester Neighborhood Plan is what happens in the event that Morrissey Boulevard floods and accessibility to the J.F.K. Memorial Library, EMK Institute, Commonwealth Museum, and UMass Boston are cut off, and potential evacuation corridors are interrupted. A Better City offers the following recommendations to help strengthen the Dorchester Neighborhood Plan:

- **Ensuring Accessibility to the J.F.K. Memorial Library, Edward M. Kennedy Institute for the United States Senate, Commonwealth Museum, and University of Massachusetts, Boston:** Similar to earlier questions raised regarding Logan Airport accessibility, A Better City recommends clarifying to what extent risk modeling in Dorchester accounts for lack of accessibility to federal assets like the J.F.K. Memorial Library, Edward M. Kennedy Institute for the United States Senate, state assets like the Commonwealth Museum, and critical higher education leaders like University of Massachusetts, Boston.
- **Ensuring Maintenance of Evacuation Corridors Via Morrissey Boulevard:** Given the importance of Morrissey Boulevard in serving as a critical potential evacuation corridor for residents of Dorchester, A Better City recommends ensuring that the Dorchester Neighborhood Plan interventions do not preclude or ignore the need to maintain accessibility to Morrissey Boulevard as a possible evacuation corridor for local residents. This will be especially important for protection of loss of life, as the Draft Study's modeling anticipates some of the highest risks of loss of life in Dorchester, of any neighborhood plan within the USACE Draft Study for Boston.

Downtown Neighborhood Plan, in Support of DT3

A Better City strongly supports the DT3 option for a continuous flood barrier stretching from the Wharf District along the waterfront and fully encompassing the North End, as this is the only option that will ensure that Boston, the New England region's economic hub, and its critical infrastructure and communities can survive in the face of increasing coastal flood risks overtime. DT3 would be more effective at protecting places of federal, historic, and cultural significance, like the Old North Church National Historic Landmark in the North End, the Steriti Memorial Rink, Converse Global Headquarters, the New England Aquarium, the Rose Kennedy Greenway, and the Federal Reserve Bank of Boston, among others. Whenever possible, the USACE Draft should consider opportunities to protect all properties and wharfs along the water's edge downtown. Additionally, DT3 would help to prevent storm surge and other coastal flooding from impacting the Sumner, Callahan, and Thomas P. O'Neill Jr. (I-93) tunnels, containing critical evacuation pathways and federal transportation assets. Alongside the risk of flooding entering these tunnels, there is added risk of the sheer weight of the volume of water associated with storm surge and other coastal flooding sitting on top of the tunnel structure, particularly the Central Artery and I-93 tunnel. Enabling storm surge water to flood above the tunnels could undermine the structural integrity of these critical transportation pathways in and out of the City of Boston, meaning an added risk of tunnel collapse. A Better City suggests implementing the following recommendations to augment and enhance the Downtown Neighborhood Plan:

- **Modeling Impacts to the Central Artery and I-93 Tunnel:** A Better City recommends modeling potential flooding impacts to the Central Artery and I-93 tunnel, including how such impacts and risks may change via the DT3A vs. DT3 alternatives.
- **Including the James Hook & Co. Site:** A Better City is concerned by the exclusion of the James Hook & Co. site from enclosure within the flood protection barrier proposed and recommends amending this to ensure that a wall along Atlantic Avenue does not cut off the James Hook & Co. site from protection. Instead, the alignment should extend around the perimeter of the James Hook & Co. site to ensure continuous protection along the Harborwalk and water's edge. This would also help to maintain flood protection in close proximity to the Seaport Boulevard Bridge.

East Boston Neighborhood Plan, in Support of the EB2 + EB3A Alignment Alongside the Edge of Chelsea Creek

A Better City strongly supports and urges the USACE to select the EB2+ EB3A East Boston alignment along the edge of Chelsea Creek rather than the Route 1A median flood barrier alignment, given the significant risks inherent to the Route 1A alignment in relation to Logan Airport connectivity and accessibility to the surrounding region, evacuation and emergency response transportation corridors, and the regional and national economy. Additionally, A Better City strongly supports the need to protect the Blue Line Rail Yard adjacent to Belle Isle Marsh and is grateful that this is included in both alternatives for East Boston. A Better City offers the following recommendations to help strengthen the Draft Study's Neighborhood Plan for East Boston:

- **Pursuing an Additional Study for East Boston:** A Better City strongly supports the need to locate a flood barrier along the edge of Chelsea Creek to protect property along Route 1A and its southbound lanes. These properties are critical to supporting Logan Airport operations and accessibility; even if Logan is not inundated with flooding, it cannot remain operational if surrounding access points in East Boston are cut off. A Better City supports the Chelsea Creek flood barrier alignment and recommends pursuing the additional study suggested in the Army Corps report for additional modeling.
- **Ensuring Logan Airport Accessibility:** A Better City recommends clarifying via modeling and additional narrative what would happen in the event of flood inundation isolating Logan Airport from local transportation access routes. A Better City recommends including further detail regarding the elevation of Logan Airport and ensuring that whatever option is chosen, access to the airport via tunnels and roadways is maintained, particularly for emergency response like FEMA teams to access Boston.
- **Addressing Gaps in Flood Protection at Piers Park:** A Better City supports the flood walls proposed along the Inner Harbor side of East Boston but has some concern about noted gaps within the barrier alignment that result in residual risks, including at Piers Park and elsewhere. Given the potential for displaced water volume and wave energy being channeled into these breaks in the flood barrier, A Better City would like to understand why gaps remain in the proposed harborside flood barriers and recommends clarifying why certain parts of East Boston are left exposed. The Piers Park gap in the structural elements for flood protection would also leave the Boston Harbor and Shipyard Marina vulnerable, which includes a critical dry dock servicing MBTA ferries. Additionally, A Better City is concerned that the proposed vertical element, or speed table, on Marginal Street by Piers Park is both insufficient to prevent inundation of the surrounding neighborhood and will also hinder local ground transportation of light- and medium-duty freight vehicles and MBTA buses that often utilize the area. With a proposed 14'NAVD88 for this vertical element, A Better City recommends clarifying how local transportation routes will be impacted, and what kinds of vehicles will be able to safely navigate a street with 14'NAVD88. Additionally, as mentioned previously, all flood barrier heights should be consistent with 15'NAVD88, therefore, if implemented as a speed table at Marginal Street, then this vertical element should be raised to 15'NAVD88.
- **Including the Fuel Terminal at Chelsea Creek:** North of Orient Heights, one of the Draft Study's maps show a levee and other flood barriers along the Chelsea Creek waterfront, yet the text says that the Chelsea Creek fuel terminal is excluded from barrier protection. A Better City recommends ensuring that proposed plans for East Boston confirm protection of critical regional infrastructure facilities like the Chelsea Creek fuel terminal, as potential inundation would result in significant contamination of the Boston Harbor, Chelsea Creek, and Belle Isle Marsh, thereby adding to modeled economic costs required by remediation.
- **Leveraging Existing Rail Line Infrastructure for Flood Protection:** A Better City recommends considering the abandoned rail line along Chelsea Creek in East Boston as a foundation for an innovative and inclusive flood barrier. The rail line itself could provide an affordable and accessible piece of

contiguous real estate upon which a flood barrier could be built, with a green and grey infrastructure rail trail on the top, like the New York City High Line.

South Boston Neighborhood Plan, in Support of SB3

A Better City strongly supports the SB3 alternative, including and encompassing the Ray Flynn Marine Park (RFMP). The RFMP is a critical fish processing facility that necessitates close and easy access to Logan Airport, where locally caught fish is shipped nationally and internationally. In addition to the site serving as a seafood distribution hub moving more than 20 million pounds of seafood per year, the RFMP site is also home to companies in life sciences, research and development, and advanced manufacturing, as well as one of the region's first craft breweries that is deeply tied to Boston's cultural identity. If the RFMP were to become inundated with coastal flooding and cease operations, then economic impacts would be felt nationally and globally via restrictions and delays within the global fishing industry, among others. Additionally, the importance of Dry Dock 3 in South Boston cannot be overstated, as this is one of the largest dry docks for shipping repairs in the region, and one of the top 3 along the Eastern seaboard. SB3 would help to ensure that this Dry Dock remain operational, and that national and global impacts to shipping industries would not result from coastal flood inundation in Boston. Finally, the Boston Children's Museum is an iconic and nationally-renowned museum and community cultural institution that is in its own climate resilient renovation process. The USACE Draft Study must work to protect assets like the Museum, as well as to integrate planning for barrier height, timeline, and sequencing of construction that does not hinder the Museum's and other stakeholder's resilience planning. A Better City offers the following recommendations to help strengthen South Boston Neighborhood Plan:

- **Expanding Upon the Fort Point Storm Surge Barrier:** In both the SB2 and SB3 alternatives for South Boston, a storm surge barrier at the mouth of Fort Point Channel is recommended, which would be closed in advance of forecasted large storm events, and would likely be constructed after Downtown-side flood protection interventions along the Fort Point Channel. A Better City is concerned as to whether this storm surge barrier is sufficient, both in addressing high frequency flood events that would not necessitate a barrier closure, as well as potential damage to come in between Downtown's flood barrier completion and the storm surge barrier construction, which may be decades later depending on project sequencing. A Better City recommends clarifying how Fort Point Channel properties will be protected in events of flooding when the storm surge barrier is not closed, and what could help to ensure South Boston's protection after Downtown barriers are completed and prior to storm surge barrier completion. Additionally, Arup engineers and Wharf District Council members have flagged concerns about connecting outfall pipes to the Fort Point storm surge flood barrier. A Better City supports their recommendation to install outfall pipes in close proximity to new seawalls, to ensure that stormwater drainage is enabled, and not precluded, alongside storm surge protection (you can learn more from the [Wharf District Council Climate Resilience Plan](#)). Finally, A Better City questions the omission of additional projects along the south side of the Fort Point Channel, as there are critical flood pathways that are unaddressed in the Draft Study. Alongside clarification of how the Draft Study will address these flood pathways, A Better City recommends ensuring that existing flood protection barriers already completed and in progress along the Fort Point Channel (including the berm anticipated to be built by FEMA near the Gillette site and the Boston Children's Museum renovation) are integrated and aligned in elevation with proposed plans by the USACE.
- **Expanding Benefit-Cost Modeling for Ray Flynn Marine Park to Include Industries Beyond Seafood Distribution:** As mentioned above, RFMP is home to industries in the life sciences, research and development, advanced manufacturing, and craft brewing. Affirming concerns raised by Marcus Partners, A Better City recommends amending the benefit-cost modeling for the RFMP site to include industries beyond seafood distribution in order to adequately reflect the full range of economic and business activity provided by RFMP to Boston, the region, and the national economy.

- **Including Conley Terminal in Benefit-Cost Modeling:** A Better City is concerned that the Conley Terminal, New England's only full-service container port, was excluded from the South Boston Neighborhood Plan, and that no structural elements for flood protection are included for the Terminal. From a business perspective, the economic activity supported by Conley Terminal has a significant impact on the regional and national economy. If left unprotected, then inundation and disruption of the Conley Terminal's operations could significantly contribute to the \$54B or more potential risk of inaction to Boston. Therefore, A Better City recommends including Conley Terminal in the Draft Study's benefit-cost analysis, considering the Terminal for structural flood protection beyond non-structural elements, and ensuring that anything proposed in the Draft Study ensure operational continuity at Conley Terminal.

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