



October 1, 2018

Colonel Thomas D. Asbery
US Army Corps of Engineers
New York District
24 Federal Plaza
New York, NY

Joseph Seebode
Deputy District Engineer for Programs and Project Management
US Army Corps of Engineers
New York District
24 Federal Plaza
New York, NY

Re: New York-New Jersey Harbor and Tributaries Coastal Storm Risk Management Feasibility Study

Dear Colonel Asbery,

On behalf of the Waterfront Alliance, I am writing to register our comments regarding the approach for the New York-New Jersey Harbor and Tributaries Coastal Storm Risk Management Feasibility Study.

We appreciate the Army Corps of Engineers' work to study options for increasing the resilience of our region to coastal storms, climate change and sea level rise. New York remains as vulnerable as ever, and we need solutions that ensure the equitable resilience, accessibility, and ecological integrity of our communities. There is no silver bullet to address our increasing vulnerability, and little silver to pay the cost and most important, as we experience environmental calamity after environmental calamity, there is little time. The contexts are nuanced and the solutions varied— there are policy, financing, and programmatic as well as structural solutions that need to be considered. The application of these solutions (or, conversely, lack thereof) will affect our communities for generations to come. We support and agree with the need for a regional study, and encourage the Army Corps of Engineers to ensure that this study engages communities and analyzes the full range of solutions in a manner that is reflective of that gravity and context.

Our specific comments are as follows:

- **Revisit or clarify alternative selection to ensure that it begins from an assessment of vulnerability and need.** In assessing and addressing climate vulnerability, the standard approach is to first determine the locations of dense residential populations, vulnerable communities, critical assets, and habitats. Areas of highest need are then identified, and a suite of possible alternatives tailored to each context proposed before analysis is conducted.

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The approach presented by the Army Corps of Engineers in June appears to begin in the reverse, with pre-selected alternatives first and the additional lens of human and environmental need second. If the selection of these alternatives involved a previous study of vulnerability and need, it should be presented clearly in a public forum. If this is not the case, the process should be modified to ensure an efficient, equitable, and sound approach in determining areas of focus for protection.

- **Significantly increase outreach and engagement during the “public and agency reviews” process.** The number of public meetings held in communities affected by the study should significantly increase to ensure an equitable and informative process. As a relevant example, the New York City Department of City Planning’s outreach process to share and solicit feedback into how the City’s zoning could be updated to accommodate increasing flood risk included more than 110 public meetings and events. Important local knowledge critical to determining equitable and sound resilience solutions may not be captured without robust community engagement.
- **Thoroughly evaluate the role of non-structural measures and context of planned and built resiliency projects.** As many years are likely to pass before any large-scale structural solutions are built, a thorough analysis of the impacts of funded planned projects, as well as the potential impacts of policy, programmatic, and regulatory changes should be conducted to gain a full picture of the benefits of various measures in context. Changes to zoning, buyouts, incentives to retrofit, and other solutions are already being implemented and could be increased as part of the mix of future solutions. If these efforts are not adequately considered, the true costs and benefits of added value to these solutions risk improper estimation.
- **Thoroughly evaluate natural and nature-based feature strategies** as part of each reach strategy, including a cost benefit analysis that reflects the multiple benefits provided by these features.
- **Use a sea level rise-adjusted context:** future sea level rise is unequivocal. And, though the level at which it will rise is within a range, the degree of certainty for the year 2080 and earlier is relatively high. It is recommended that the Army Corps of Engineers use moderate and high scenarios in keeping with those developed by the New York Panel on Climate Change to not just inform the study, but to determine the approach taken and target design level for each strategy. We face serious impacts from sea level rise and regular future tidal flooding as well as storms, and this consideration, and the fact that strategies may be different for each, must be included.
- **Isolate cost-benefit analysis by reach/protection area and strategy to enable proper comparison.** The current framing of alternatives suggests that the cost-benefit analysis will be conducted for each alternative as a whole. It is recommended that cost-benefit analyses be conducted (and summarized clearly for public review) for each contained reach strategy (e.g. Gowanus barrier, NYC west side shoreline-based measure) in isolation as well as combination. To support the best possible assemblage of measures and clear communication and advocacy for these measures, their individual costs and benefits should be clear.



- **Carefully review the quality of life, economic, and environmental impacts, and how they are likely to change over time.** Each of these strategies may have significant impacts – wetlands loss due to barriers to migration, sediment transport and dissolved oxygen, communities’ ability to have access to their largest public space, and our small and moderate-sized maritime businesses. It is understood that environmental and social impact review is part of the NEPA process. Impacts to quality of life, access to and from the water, maritime operations, and the environment that account for sea level rise and flooding from surge as well as precipitation are critical to consider as early as possibly in this process.

Thank you for your review and attention to this matter. If you have any questions about this letter, please feel free to call me at (212) 935-9831.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Roland Lewis'.

Roland Lewis
President and CEO