August 15, 2018

Bryce W. Wisemiller
Project Manager
U.S. Army Corps of Engineers, New York District
Programs and Project Management Division, Civil Works Programs Branch
26 Federal Plaza, Room 2127
New York, NY 10279-0090

Re: U.S. Army Corps of Engineers -- New York/New Jersey Harbor & Tributaries Focus Area
Feasibility Study

Dear Mr. Wisemiller:

As the Westchester County Executive, representing almost 1 million people who live in the study area, I am deeply concerned about both the process and the potential impacts of the proposals developed as part of the New York-New Jersey Harbor and Tributaries Feasibility Study. While I recognize the importance of the study's goals, to reduce the risk of coastal storm damage; contribute to the resilience of communities, critical infrastructure, and the environment; and to enhance public health and safety, I do not believe the public has been given sufficient time or information to comment on a study of this magnitude and potential impacts. Therefore, I urge the U.S. Army Corps of Engineers to: (1) extend the public comment period to at least 90 days; (2) provide additional information concerning the project, including more detail on the alternatives presented and some description of how the alternatives were developed; and (3) hold additional public hearings, including one in Westchester County.

Many communities in Westchester County have experienced coastal storm and flooding damage and have already taken significant actions to protect their communities, residents, environment, critical infrastructure, and improve their resiliency to impacts associated with a changing climate. I urge you to first prioritize ways to work cooperatively with these communities to support and build on the actions they already have underway. The federal government designated the Hudson River as an American Heritage River, and New York State has an extensive, ongoing Hudson River Estuary Program that has undertaken many studies and administers programs to help Hudson River municipalities address these issues. Many of these programs are encouraging coastal municipalities to reimagine their communities in exciting new ways, not only increasing resilience and reducing risk but providing additional amenities and spurring economic activity. The U.S. Army Corps of Engineers should consider ways to support and work with these well researched and publicly supported programs and actions rather than constructing physical barriers that will impact the tidal flows to this unique and irreplaceable river and estuary.
George Latimer  
County Executive

I also question how a cost benefit analysis will be applied in this study. With such a large and diverse study area, there may be some benefits to very densely populated areas, but at a significant cost to less dense, upstream communities. The potential impacts to Hudson River and Sound Shore communities are very significant and should be considered directly, not weighed against the impacts in other communities. A detailed analysis of potential opportunity costs and social equity issues associated with the alternatives should be incorporated into the environmental factors analyzed.

Instead of a focus on building massive man-made structures to control our environment, I urge the federal government to focus on taking immediate and meaningful actions to reduce the human impact on climate change. If our efforts were focused on prevention, it could negate the need to consider these large scale, costly construction projects with such significant environmental consequences. Although we cannot prevent all damage from coastal storms and flooding, we can take significant actions to reduce risk without such potentially devastating environmental impacts and consequences.

Thank you for your consideration of these comments and requests. If you need any further information, please contact Peter McCartt (914-995-2905, PMcCartt@WestchesterGov.com)

Sincerely,

George Latimer  
Westchester County Executive

cc:  U.S. Senator Charles Schumer  
     U.S. Senator Kirsten Gillibrand  
     U.S Representative Nita Lowey  
     U.S. Representative Eliot Engel  
     U.S. Representative Sean Patrick Maloney