



LEAGUE OF WOMEN VOTERS
of the RIVERTOWNS

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September 16, 2018

U.S. Army Corps of Engineers, New York District
26 Federal Plaza, Room 2151
New York, NY 10279-0090
Attn: Nancy J. Brighton
Chief, Watershed Section
Environmental Analysis Branch, Planning Division

Dear Ms. Brighton,

The League of Women Voters of the Rivertowns recently hosted a presentation by Riverkeeper on the proposed storm surge barriers on the Hudson River. We are deeply concerned that there has not been adequate study of the environmental impact of the proposed storm water barriers. When asked in the meeting if anyone had been informed or even seen a poster on the few public meetings ACE has held on this important project, no one raised a hand.

I am writing as President of the Rivertowns League to request that comprehensive, critically important environmental studies be completed in advance of any action or decision made as part of the New York-New Jersey Harbor and Tributaries (NYNJHAT) Coastal Storm Risk Management Feasibility Study, including the selection of a tentatively selected plan or plans from the array of six alternatives under consideration.

We are deeply concerned about the significant environmental impact and other consequences that could result from these alternatives, particularly the four that include in-water barriers throughout New York Harbor. These four plans (Alternatives 2, 3A, 3B, and 4) threaten to permanently damage the life of the Hudson River Estuary.

Studies must evaluate the potential effects on all the affected water bodies, including the Hudson River and its tributaries, New York Harbor, Hackensack River, Passaic River, Raritan River, The Meadowlands, Jamaica Bay and Long Island Sound. Studies must examine how the impacts would vary over the life of any structures, 100, 200, 300 years out.

Please report back to me on the findings of all studies related to all six alternatives.

The potential impacts of these plans are enormous. The public needs a greater opportunity to become informed. The Corps should schedule more public meetings throughout the entire affected area. I have never seen a poster, email or outreach from the Corps to the public. I was alerted only by Riverkeeper. I believe you have an obligation to make a greater effort to educate and involve the general public once you have thorough environmental studies in hand, and to take no action until this is done.

The Corps must provide more detail about the alternative plans, including the size and number of all ship and tidal exchange gates in all barrier alternatives, and the sea level threshold for closure of the gates. The maps shared with the public offer too little information to make effective scoping comments, which is my right under the law.

The Corps should include “ecosystem services” in its evaluation of the current array of alternatives.

In any cost-benefit analysis of the alternatives, including those with harborwide barriers, the Corps should include the cost of shoreline measures that are essential to protect against flooding from sea level rise.

I request that no plan be advanced unless it addresses flooding from BOTH storm surge and sea level rise. For any plan that is advanced, I request that you study the following:

- Tidal range/regime and flow velocity
- Migration of all native fish species
- Abundance of all native and currently existing fish species
- Abundance and distribution of all mollusk species throughout the study area
- Current and potential commercial and recreational fisheries
- Endangered, threatened and special-concern fish and wildlife species (both federally and state designated) in the New York Bight and in the Hackensack, Passaic and Raritan Rivers, the Meadowlands, Jamaica Bay and Long Island Sound
- Vegetation (subaquatic and intertidal)
- Birds
- Habitat for fish, birds and other wildlife
- Sedimentation rates, scour and elevation in the rivers, bays and harbor
- Changes in contamination levels both in the water and in river and harbor sediments
- Rate at which PCBs and other contaminants will be transported from the rivers and harbor to the sea
- Water quality in the harbor, rivers and bays
- Dissolved oxygen levels throughout the study area
- Salinity throughout the study area
- Water temperature throughout the study area
- Frequency of algae blooms throughout the study area
- The degree and cost of wastewater treatment required to comply with the Clean Water Act, in light of reduced tidal exchange/flushing
- Induced coastal flooding or deflection of storm surge to areas adjacent to any barrier alternatives
- Back-flooding inland of any barriers due to heavy rain events
- Commercial shipping
- Recreational boating
- Cost to state taxpayers for future operation and maintenance of ship and tide gates in any barriers

Given the enormous and eternal consequences that would result from the project alternatives listed in the NYNJHAT Feasibility Study, any initial selection or prioritization of alternatives is unconscionable without knowledge of the full range of impacts.

Thank you for your consideration and your service.

A handwritten signature in black ink, appearing to read "Lynn Levine". The signature is fluid and cursive, with the first name "Lynn" and the last name "Levine" clearly distinguishable.

Lynn Levine, President

League of Women Voters of the Rivertowns