

# Hudson River Drinking Water Intermunicipal Council

Town of Esopus, Town of Hyde Park, Town of Lloyd, City of Poughkeepsie,  
Town of Poughkeepsie, Town of Rhinebeck, Village of Rhinebeck

October 25, 2018

*Via electronic and U.S. mail*

Bryce W. Wisemiller, Project Manager  
Programs and Project Management Division, Civil Works Programs Branch  
U.S. Army Corps of Engineers, New York District  
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## **Re: Comments on Scoping of New York New Jersey Harbor and Tributaries Coastal Storm Risk Management Feasibility Study**

Dear Mr. Wisemiller and Ms. Brighton:

On behalf of the Hudson River Drinking Water Intermunicipal Council, I write to request 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 also request additional public outreach.

The Hudson River Drinking Water Intermunicipal Council ("Council") was established by an intermunicipal agreement, and is made up of elected representatives from each of the seven municipalities that rely on the Hudson River for drinking water: City of Poughkeepsie, Village of Rhinebeck and the towns of Esopus, Hyde Park, Lloyd, Poughkeepsie and Rhinebeck. In all, more than 100,000 people rely on the Hudson River for drinking water. The Council's goal is source water protection to ensure that the Hudson River is a safe source of drinking water for our communities for generations to come. The health of the Hudson River is a matter of public health for our communities.

## **1. Environmental studies be completed in advance of any action or decision**

The NYNJHAT study area encompasses 2,150 square miles, including the entire reach of the Hudson where our communities draw drinking water, and significant areas of the Hudson and its tributaries that are defined by the Department of Health-delineated Source Water Assessment area for our drinking water supplies.

We are concerned about the significant environmental impacts and other consequences that could result from the alternatives outlined by the U.S. Army Corps of Engineers ("USACE"), particularly the four that include in-water barriers throughout New York Harbor (Alternatives 2, 3A, 3B and 4). Our specific concerns are associated with potential changes to water quality from these proposed alternatives, and we write to request specific studies to evaluate the potential effects of any alternative over the life of any structures to be built.

In its cost-benefit analysis of the current array of alternatives, the USACE should include an evaluation of the value of ecosystem services, including the value of ecosystem services associated with Hudson River water quality, which affects the cost of water treatment. Further, we request that the full range of impacts be considered before the six alternatives are narrowed. Before any alternative is eliminated from consideration, the potential impacts of each alternative should be studied, including specifically in relation to water quality in the mid Hudson, where our drinking water intakes are located. Study of potential impacts should include, but may not be limited to:

- Water quality in the Hudson River, including dissolved oxygen, salinity, temperature and nutrients.
- Frequency and severity of algae blooms throughout the Hudson River.
- Tidal range / regime and flow velocity.
- Sedimentation rates, scour and elevation in the Hudson River.
- Changes in contamination levels both in the water and river sediments.
- Rate at which PCBs and other contaminants will be transported from the rivers to the sea.
- The degree and cost of wastewater treatment required to comply with the Clean Water Act, in light of reduced tidal exchange / flushing.

## **2. Public outreach**

USACE recently announced an extension of public comment to November 5. Thank you for extending the public comment period. While necessary, the extension of public comment period is insufficient to meet the needs for public outreach, given the extensive and long-range impacts of the project.

The USACE has hosted five public sessions on three days in three locations, in New York City, Newark and Poughkeepsie, and it has announced two additional meetings in Brooklyn and Westchester County. The meeting in Poughkeepsie was announced with just 12 days' notice, and no members of our Council were able to attend. We request that additional public meetings be scheduled throughout the Hudson River region that could be affected by the proposed alternatives, including at least one additional meeting in the mid-Hudson region.

The Council on Environmental Quality implementing regulations for the National Environmental Policy Act require agencies to make "high quality" environmental information available to the public "before

decisions are made and before actions are taken." The limited information provided to date, for such a consequential decision as the narrowing of alternatives, is insufficient for our Council to meaningfully comment. There is insufficient information to evaluate the potential specific impacts on water quality in the mid Hudson, our primary concern.

Thank you for your consideration and your service.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gary Bassett".

Gary Bassett

Chair

Hudson River Drinking Water Intermunicipal Council

CC: Basil Seggos, Commissioner  
New York State Department of Environmental Conservation  
625 Broadway, 14th Floor  
Albany, NY 12233-1010