



CITY OF NEW YORK
MANHATTAN COMMUNITY BOARD FOUR

424 West 33rd Street, Suite 580 New York, NY 10001

tel: 212-736-4536
www.mcb4.nyc

JEFFREY LEFRANCOIS
Chair

JESSE R. BODINE
District Manager

March 6, 2023

Mr. Bryce W. Wisemiller
Project Manager
NYNJHAT Study Team, Planning Division
U.S. Army Corps of Engineers
26 Federal Plaza, 17th Floor
New York, NY 10279-0090

Re: New York/New Jersey Harbors and Tributaries Study - Proposed Action Plans

Dear Mr. Wisemiller,

Hurricane Sandy in 2012 demonstrated the massive amount of damage to communities, infrastructure and lives an extreme storm surge can deliver. We understand this is not an isolated incident and scientists predict these storms will be even more frequent and severe in the future.¹ In response, the US Army Corps of Engineers (USACE) launched the North Atlantic Coast Comprehensive Study to study coastal storm risk management strategies and identified the New York/New Jersey Harbors and Tributaries (NYNJHAT) area as one of three focus areas.

In 2016, in partnership with the New York State Department of Environmental Conservation (NYSDEC) and the New Jersey Department of Environmental Protection (NJDEP), the USACE embarked upon the NYNJHAT study recently producing five action plans (Alternative 2, Alternative 3A, Alternative 3B, Alternative 4 & Alternative 5) marking Alternative 3B as the tentative Selected Plan (TSP).

While we understand the vastness and comprehensive nature of the plans, covering over 2,150 square miles and 900+ miles of affected shoreline, 25 NY & NJ counties and an affected population of roughly 16 million people, Manhattan Community Board 4 (MCB4) would like to provide initial comment on the TSP and its direct effect on our district.

¹ https://www.nationalacademies.org/based-on-science/climate-change-global-warming-is-contributing-to-extreme-weather-events?fbclid=IwAR3h-sG_klyXw6UstrmKdERvTowAlwV3phQYo98EENVWrOkpCbIEvRvQ46SE

MCB4 would like to thank the USACE for your presentation on December 8, 2022 to MCB4's Waterfront, Parks and Environment Committee and for extending the comment period to March 7, 2023. The Board voted, by a count of 36 in favor, 0 against, 0 abstentions and 0 present but not eligible, to provide the following comments, criticisms and concerns of the New York-New Jersey Harbor and Tributaries Study Draft Integrated Feasibility and Tier 1 Environmental Impact Statement (the "Report").

The Report contains multiple conceptual plans considered by the USACE to accomplish the goal of storm surge risk reduction and induced flood mitigation. The plan ultimately endorsed by the USACE (TSP) recommends building 11-17 foot high walls running parallel to the shoreline, from the southern edge of Community District 4 (CD4) at West 14th Street up to West 34th Street (attached A). Although representatives from the USACE stressed this was a conceptual and preliminary plan and no siting or details for such a wall has been determined, the rendering furnished by the USACE shows a concrete wall located between the walking and bicycle greenway path, adjacent to Route 9A, and Hudson River Park (attached B).

Certainly, MCB4 cannot support the TSP as presented. The effects of building a massive, unsightly wall along the western edge of Route 9A will cut off CD4 from not only the Hudson River but also from Hudson River Park.

For years, CD4 had such a dearth of parkland that it routinely ranked among the bottom city-wide in available park space. This was partially remedied by the creation of Hudson River Park by the state legislature. The City and the State have spent hundreds of millions of dollars developing and building Hudson River Park to universal acclaim and provided the area desperately needed access to green, open spaces. Hudson River Park and its accessibility has helped improve property values along the far west side leading to significant increases in tax revenue for both the City and the State.

A 15+ foot wall serving as a grotesque obstacle between a community and its greatest green space would undo two decades of development of Hudson River Park. Cutting off the waterfront park from the community with a fixed, solid wall would return to the days of physical separation of residents, many low-income, from green space and, ironically, prove environmentally disruptive. Further, many of the park's features would be disfigured or destroyed by unsightly berms and barriers.

In addition to the wall, the TSP notes a levee along Hudson River Park located between West 22nd Street and 24th Street and planned to be 11-15 feet tall and 76 feet wide (attached C & D). With 15-foot easements on either side within which trees cannot be planted, it creates a total structure width of 111 feet. This represents a loss of a majority of the park in our district which is unacceptable to MCB4.

Of the five alternative action plans, the TSP (3B) only benefits 63% of the study area at direct risk. Alternative plans 2 and 3A, containing much preferred and more effective offshore barrier systems, benefit 96% and 87.1% of the study area at direct risk (attached E & F).

MCB4 notes another important variable - the proposed storm walls in the TSP require openings to allow access to and from the waterfront, as well as to businesses located outside the wall, such as Chelsea Piers. Failure to properly close off one of those entrances could result in failure to the entire system. This would help result in areas of our community poorly protected against storm surges and sea level rise behind a network of unreliable “deployables,” not the preferred result of a multi-billion dollar project.

MCB4 understands heavy consideration of cost mitigation factored into the selection of the TSP. While we acknowledge the importance of financial analysis, MCB4 is extremely disappointed no consideration was given to community living and our access to our limited green spaces. We urge the USACE to seriously consider the deterioration of our everyday quality of life if a storm wall and levee were to be built on the west side of Manhattan.

MCB4 strongly urges the USACE to reexamine the TSP and include coastal storm risk management elements of alternative plans 2 and 3A, utilizing an offshore barrier system, which may include sea gates.

This will result in the following:

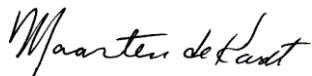
1. A greater protected area
2. Include more miles of risk reduction features
3. Incorporating approximately double the area of inducted flooding-mitigation features
4. Eliminate the need for approximately 20 miles of shoreline-based features, including the Manhattan west side wall

With more effective and appropriate options, MCB4 assures no popular support for the current TSP. We look forward to the USACE response and ongoing discussions as we work together to manage future flood risks that both protect our neighborhood and support long-term sustainability.

Sincerely,



Jeffrey LeFrancois
Chair
Manhattan Community Board 4



Maarten deKadt
Co-chair
Waterfront, Parks & Environment Committee



Leslie Boghosian Murphy
Co-chair
Waterfront, Parks & Environment Committee

Enclosure

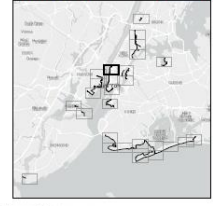
cc: Hon. Brad Hoylman-Sigal, New York State Senator
Hon. Linda Rosenthal, New York State Assemblymember
Hon. Tony Simone, New York State Assemblymember
Hon. Erik Bottcher, New York City Council, Council District 3
Hon. Mark Levine, Manhattan Borough President

Attached A



New York City
West Side SBM

NYNJHAT Study Alternative 3b SBM & IFF



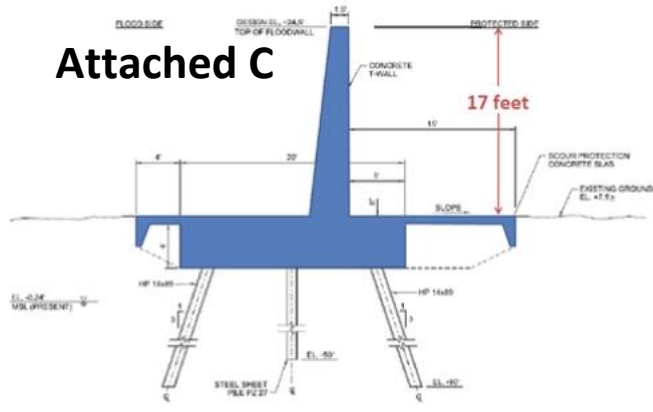
- Measure Type**
- Large Levee
 - Medium Levee
 - Extra Large Floodwall
 - Floodwall with Park
 - Large Floodwall
 - Medium Floodwall
 - Elevated Promenade
 - Reinforced Dune - Natural Dune Cover
 - Reinforced Dune - Partial Dune Cover
 - Seawall
 - Tide Gate
 - Storm Surge Barrier
 - Deployable Flood Barrier - Flip Up Barrier
 - Deployable Flood Barrier - Pedestrian Gate
 - Deployable Flood Barrier - Railroad Gate
 - Deployable Flood Barrier - Vehicle Gate
 - Large Levee with Road Ramp
 - Medium Levee with Road Ramp
 - IFF Large Levee*
 - CSRM Residual Risk with Project
 - CSRM Reduced Risk with Project
- *IF* elements are denoted with a yellow highlight around SBM line symbology
- The data displayed on this map illustrate the scale of potential flooding, not the exact location, and do not account for future ground elevation, shoreline, or hydrological changes that occurred after the source data was produced. Impacts will be assessed to occur at a distance above the NAVD8 datum (i.e., bathymetric model) as indicated on the map. All non-impacted areas are assumed to be hydrologically "connected". Actual flooding extents may vary due to the unique characteristics of a coastal flooding event as well as the potential combined effects of rainfall run-off, backflow through existing sewerage infrastructure, and sewage. The line width shown is meant to provide an indication of the proposed placement of the measure, but should not be construed as the exact or final, nor is the line width representative of the scale of the CSRM measure.

Map 10 of 27

Attached B



Attached C



Attached D

