Mr. Bryce Wisemiller
Programs and Project Management Division, Civil Works Programs Branch
The U.S. Army Corps of Engineers, New York District
26 Federal Plaza, New York, NY 10278

Ms. Nancy Brighton
Planning Division, Environmental Analysis Branch
The U.S. Army Corps of Engineers, New York District
26 Federal Plaza, New York, NY 10278

Comments on the New York-New Jersey Harbor and Tributaries Feasibility Study

Dear Mr. Wisemiller and Ms. Brighton:

Thank you for this opportunity to comment on the scoping of the proposed New York-New Jersey Harbor and Tributaries Feasibility Study. On behalf of Billion Oyster Project and our constituent schools, restaurants and communities we urge further study, a more holistic approach to understanding the full cost of each proposed intervention, the inclusion of natural and nature based solutions and most importantly a more robust and inclusive public process that directly involves ALL of the communities that stand to be impacted by any comprehensive flood risk management solution.

Billion Oyster Project works to restore oyster reefs to New York Harbor through public education initiatives. We believe in and are working towards a future in which New York Harbor is the center of a rich, diverse, and abundant estuary that communities surrounding this complex ecosystem have helped construct, and in return benefit from, with endless opportunities for work, education, and recreation. We believe that the Harbor is a world-class public space that should be well used and well cared for. Over the last several years we have grown into a city-wide movement. We work actively with 55 schools in all five boroughs. These schools, led by the Urban Assembly New York Harbor School, have worked with our professional staff to restore almost 30 million oysters on 7 acres of reef throughout the Harbor. We collect eight thousand pounds of oyster shell from 80 restaurants every week and host hundreds of volunteers each year. We work actively to restore oysters in marginalized communities that are most vulnerable to climate change, rising water levels and more intense storms. These communities, schools, restaurants and volunteers are all working to restore oyster reefs and the ecosystem services they provide. Any cost benefit analysis that does not take into consideration the ecosystem services provided by oyster reefs and other natural systems is inadequate.

We urge a more robust analysis that considers the full, long term impacts on water circulation and retention as well as impacts on existing and potential natural systems and the ecosystems services they provide. The large-scale interventions (harbor-wide storm barriers), especially those contemplated in alternatives 2 and 3, could dramatically alter critical natural systems. As restoration ecologists, we're deeply concerned about the impacts on sediment transport, fish and shellfish survival, water quality and sewage pollution retention.

The current timeline does not allow for the authentic and robust engagement of the communities most vulnerable to climate change and most likely to be impacted by these solutions. We urge a public process that includes these communities. The proposed process is inadequate--not

enough time, not enough outreach, and no consideration of sea level rise. More transparency and public input are needed to better involve New York City's diverse communities in this critical decision.

We hope the Corps and project partners will see value in the local knowledge and passionate dedication of New York City's waterfront organizations and communities. We urge a more intentional approach of direct outreach to community boards, community-based organizations, NYCHA, waterfront advocates, and environmental justice organizations, whose agendas are working towards climate resiliency for their own communities. Natural and nature-based solutions should be considered and included in any proposed solutions and the full, long term environmental and socioeconomic impacts should be carefully studied. Hurricane Sandy has brought new urgency and focus to the challenges created by storm surge, coastal flooding, storm intensity and rising sea level. Proposed solutions should address all of these issues and take into account durability and efficacy of barriers as they become more pronounced over time.

Thank you for the opportunity to submit comments and for your continued work on this complex, and critical issue.

Pete Malinowski
Executive Director
Billion Oyster Project