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Danielle Brecker
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March 5, 2023

To: Mr. Bryce W. Wisemiller, Project Manager, U.S. Army Corps of Engineers New York District, Programs & Projects Management, Planning Division

Ms. Cheryl R. Alkemeyer, NEPA Lead, U.S. Army Corps of Engineers, New York District, Programs & Projects Management, Planning Division

Jacob K. Javits Federal Building, Room 17-420
c/o PSC Mail Center
26 Federal Plaza
New York, New York 10278

RE: **Queens Community Board #2 Response to
USACE NYNJHATS Storm Risk Management Draft Plan**

Dear Mr. Wisemiller and Ms. Alkemeyer:

Based on the United State Army Corps of Engineers (USACE) presentation to Queens Community Board #2 at the full Board meeting on February 2, 2023, the ensuing discussion and input received from committee and board members, and participation in Congresswoman Velazquez Town Hall on February 23, 2023, this community board has the following comments on the NYNJHATS Storm Risk Management Draft Plan. These comments were discussed and approved by the full Board at our meeting on March 2, 2023, with a quorum present, by a vote with 29 members in favor and 1 member opposed and 0 abstentions.

1. QNS CB 2 appreciates the comprehensive scope of the USACE draft study with regard to examining and reducing the risks of sea level rise and storm surge flooding across New York City and adjacent regions to the north and west.
2. QNS CB 2 needs more time for Board Members to review USACE draft study in depth, review latest NYC/NYS plans for future flood proofing and resiliency, and consult with adjacent Community Boards that have similar or related issues, in order to formulate a more detailed response. We agree with Brooklyn CB 1 that the comment period should be extended, ideally for 12 months.

3. QNS CB 2 believes that local engagement and input are essential to the creation of a viable long run workable plan with political and economic support. However, it does not seem feasible for the USACE to engage individually with the myriad local and regional stakeholder groups that have valid environmental concerns. Going forward, we strongly recommend the creation of Task Forces to cover sub-districts of the draft plan. Each Task Force should include representatives from the covered Community Boards as well as local environmental and social justice advocacy groups, and should communicate with and solicit input from all their stakeholders.
4. QNS CB 2 believes that the Army Corps needs to coordinate their base data with the latest data being used by New York City and New York State agencies, and to coordinate their recommendations with the planning initiatives of those agencies. In particular, the Army Corp's recommended water-based measures to mitigate storm surge need to be fully evaluated and coordinated with land-based measures to mitigate inland flooding and improve storm drainage throughout the city. The Army Corps needs to examine and prevent any unintended consequences or spillover effects of their proposed water-based measures on adjacent low-lying areas of the city.
5. QNS CB 2 concurs with the letter from the NYC and NJ Urban Tributaries Working Group to the USACE dated 2/23/2023, expressing multiple concerns about the USACE study including an over-reliance on in-water barriers, the absence of modeling of inland flooding impacts, inadequate consideration of natural and nature-based features (NBBF's) and the absence of protection for many waterfront areas such as the neighborhoods along the Bronx River.
6. QNS CB 2 has specific concerns about the construction-phase and long term environmental impacts of the proposed new storm surge gates near the mouth of Newtown Creek. These concerns include the potential inhibition of tidal flow, the inhibition of the functioning of new sewage retention tunnels planned by NY City, coordination with the on-going Superfund cleanup of contamination in and around Newtown Creek and potential re-contamination, interference with on-going shipping uses along the Creek, and potential additional induced flooding during torrential rain events. We concur with the recommendations of both Brooklyn CB I and the NYC and NJ Urban Tributaries Working Group that an alternative to the proposed storm surge gates should be developed.
7. QNS CB2 feels that it is essential that any plan for new infrastructure intended to mitigate the effects of coastal storm surge also include measures such as the proposed sewage retention tunnels to eliminate the continuing harmful effects of the 13 CSO outfalls which currently discharge into Newtown Creek.
8. QNS CB 2 recognizes that the design and proposed range of shore-based measures (SBMs) along the Long Island City waterfront are very preliminary. However, we feel that measures which would block waterfront views and access as well as impede the functioning of the existing waterfront parks are unacceptable, as these parks have been constructed at major public expense and are heavily utilized. When and if they are

required, we strongly urge the use of flip-up walls rather than fixed seawalls which would permanently block visual access to the water. New measures to protect the Long Island City waterfront will also need to be coordinated with on-going and expanding ferry service and ferry stops as well as existing transit and vehicular tunnels under the East River.

9. QNS CB 2 urges the Army Corps to further evaluate the LIC waterfront north of the Queensboro Bridge, and to consider recommendations for additional low lying areas such as the area around Astoria Houses at the northwest corner of Queens, which have experienced flooding in the past.
10. QNS CB 2 recognizes that the Army Corps' jurisdiction is limited to waterways and shorelines, however it is essential that the Army Corps, NY City and NY State coordinate their analyses and plan effectively to achieve a resilient city. Additional resources must be invested in greenspace and permeable surfaces throughout the Community Board 2 to improve local flood resiliency, while providing natural cooling and tree cover. Significant investments must also be made to upgrade, expand, and make mass transit fully accessible, as well as greenways, and other low-emission transportation options to reduce carbon emissions and increase local resiliency.
11. QNS CB2 concurs with the concerns of the Blissville Civic Association as expressed in their separate letter to USACE dated 3/6/2023, and urges consideration of more green infrastructure mitigation efforts in that very vulnerable and underserved community.
12. QNS CB 2 advocates specifically for additional artificial wetlands and graded shores to protect NYC and further from the consequences of out of control emissions of CO₂, by increasing local resilience to floods, and capturing CO₂ through photosynthesis, locking CO₂ in the plant material, and finally into the soil/sediments.
13. QNS CB 2 Environment, Parks & Recreation Committee will be developing a Climate Action Plan over the next few months to address local needs and challenges, by soliciting local input. The USACE should refer to and incorporate these recommendations throughout this lengthy process.

Thank you both for your on-going efforts to inform and engage local community boards, residents, and advocacy groups regarding the Army Corp's development of this Storm Risk Management Plan. We look forward to continuing communication and dialogue over the coming years.

Sincerely,

Debra Markell Kleinert

Debra Markell Kleinert,
Queens CB2 District Manager Queens

Danielle Brecker

Danielle Brecker,
Chairperson, Community Board 2

Cc: Honorable Chuck Schumer, US Senator
Honorable Kirsten Gillibrand, US Senator
Honorable Grace Meng, US Congress
Honorable Nydia M. Velazquez, US Congress
Honorable Michael Gianaris, NY State Senate
Honorable Kristen Gonzalez, NY State Senate
Honorable Jessica Ramos, NY State Senate
Honorable Juan Ardila, NYS Assembly
Honorable Emily Gallagher, NY Assembly Member
Honorable Jessica Gonzalez-Rojas, NYS Assembly
Honorable Zohran Mamdani, NYS Assembly
Honorable Steven Raga, NYS Assembly
Honorable Robert Holden, NYC Council Member
Honorable Shekar Krishman, NYC Council Member
Honorable Julie Won, NYC Council Member
Honorable Donovan Richards, Queens Borough President
Matthew Chlebus, NYS DEC
Cherry Mui, Mayor's Office of Climate & Environmental Justice
Danielle Brecker, Chairperson, Community Board 2
Lisa Deller, Chair, Land Use & Housing Committee
Christine Hunter, Co-Chair, Land Use & Housing Committee