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August 25, 2025

Ms. Cheryl R. Alkemeyer: NEPA Lead
Ms. Bethany McClanahan, Project Manager
U.S. Army Corps of Engineers
NYNJHAT Study Team, Planning Division
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To Ms. Alkemeyer and Ms. McClanahan:

Please accept these comments in response to the US Army Corps of Engineers (USACE) Draft Integrated Feasibility Report and Tier 1 Environmental Assessment for Actionable Elements for the New York-New Jersey Harbor and Tributaries Coastal Storm Risk Management Feasibility Study (the study), and its potential effects on the people of Bronx County, NY. A 54-year-old organization, the mission of the Bronx Council for Environmental Quality (BCEQ) was to create an aesthetic, unpolluted, environment protecting a natural and historic heritage. We are a non-profit 501(c)3 run by volunteers and located on NYC's mainland.

We hereby reference and attach our 2023 comments for inclusion in our position, and we await your response to comments on both comments as we have not heard from you on the previous comments. As we stated before, your plan "includes a combination of coastal storm risk management (CSRM) measures that function as a system to manage the risk of coastal storm damage in the New York Metropolitan Area, including a combination of shore-based and in-water measures." We continue to find that these "measures neglect to protect important low-lying areas of the Bronx, produce inundated induced impacts to these areas and uplands, and should be treated as the last resort."

Kindly add actual alternatives that are meaningful and solve the problem. Old fashioned concrete solutions to coastal storm risk management that not only add to the risk, but also impairs our waterways are not acceptable.[1] Solutions that focus on one area and not the entire watershed area violate your mandated to assist in the protection of clean water, and are also unacceptable. The proposed Harlem River Actionable Alternatives Seward and Landward will have an adverse impact on areas throughout the Bronx and is unacceptable. We advocate watershed management and natural shoreline features that dissipate energy from storm surges in order to integrate coastal and non-coastal flood mitigation planning. Kindly add Climate Change first and foremost to your criteria.

We are in agreement with the comments from the Riverkeeper, the Stormwater Infrastructure Matters (SWIM) Coalition, and the R&R Waterfront Alliance.

Thank you for this opportunity to comment. We look forward to your response to our comments.

Sincerely,

Karen Argenti — BCEQ Secretary
Robert Fanuzzi — BCEQ President
Chauncy Young — HR Coalition Coordinator

Attachment

[1] "The CSRM protection is approximately 25 feet in water (seaward) from the existing Harlem Rive Drive barrier and 5 feet wide." (Environmental Appendix to the Integrated Interim Response FR and EA | July 2025 Page 10)

March 27, 2023

Mr. Bryce W. Wisemiller
Ms. Cheryl R. Alkemeyer:
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Re: ACOE NYNJ HATS Tier 1 EIS Comments

To Mr. Wisemiller and Ms. Alkemeyer::

Please accept these comments in response to the US Army Corps of Engineers (USACE) Draft Integrated Feasibility Report and Tier 1 Environmental Impact Statement for the New York-New Jersey Harbor and Tributaries Coastal Storm Risk Management Feasibility Study (the study), and its potential effects on the people of Bronx County, NY.

A 52-year-old organization, the mission of the Bronx Council for Environmental Quality (BCEQ) was to create an aesthetic, unpolluted, environment protecting a natural and historic heritage. We are a non-profit 501(c)3 run by volunteers and located on NYC's mainland. We have been in the leadership of fighting for clean water and in particular the use of green infrastructure. In 2001, after working on the Pelham Bay Landfill, the Bronx River Restoration, we turned toward protecting the Harlem River at-and-on-water access in an effort to improve water quality; and in 2009, we formed the Harlem River Working Group (HRWG). In 2011, the Bronx and Harlem River Watersheds Urban Waters Federal Partnership (UWFP) was announced as one of the first seven pilot locations. We are active members of that federal partnership.

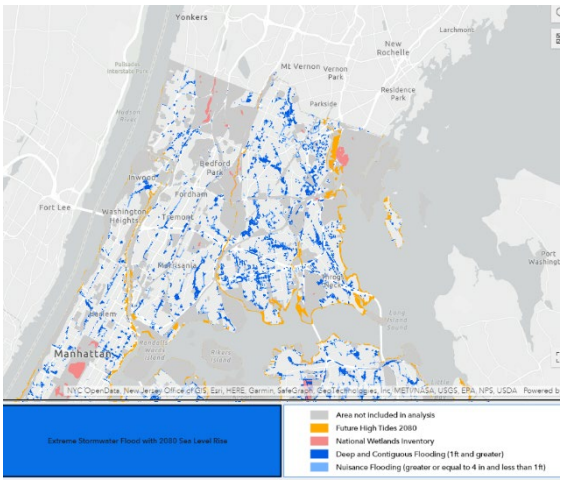
The Tentatively Selected Plan, or "Alternative 3B, includes a combination of coastal storm risk management (CSRM) measures that function as a system to manage the risk of coastal storm damage in the New York Metropolitan Area, including a combination of shore-based and in-water measures. These measures neglect to protect important low-lying areas of the Bronx, produce induced impacts to these areas and uplands, and should be treated as the last resort. We argue that the first steps should be to fix things that fell through the cracks in the recent past as the metropolitan area rushed to keep up with the shift from industry and recreation to an exploding population, human service economies, and increased housing auxiliary features, such as schools, transportation, sewers, etc.

Home to many low-income and/or otherwise disadvantaged persons, the Bronx covers one of the largest Environmental Justice areas in NYC. In addition, the feasibility study's failure to take a watershed approach, as well as ignoring the natural and geographic features of the upland peninsula, is significant to your findings. Despite the assertion that the TSP measures include complementary "Induced Flooding-Mitigation Features and Risk Reduction Features as well as nonstructural measures and natural and nature-based features"; it is not sufficient to protect us from the induced surge as well as the unintended implications from the existing naturally occurring geographic pressures in our watersheds.

PROBLEMS

1. The low-lying area of Mott Haven remains unprotected and is only included in TSP to mitigate the impact induced by other projects. Mott Haven and Port Morris have conceptual community plans accepted by the New York State Open Space Plan and which should be considered, especially given the severe impacts they suffered from the Sandy Surge.

2. Furthermore, the entire protected area of the south Bronx, from 161st Street south to Mott Haven is not on the edge of the waterfront, but inland -- cutting the population off from the water they so dearly want to be near and in. It also should be noted that this proposed Seawall blocks access not only to the waterfront and Mill Pond Park but to two cultural institutions, the Bronx Children's Museum and the new HipHop Museum (at 153rd St and 150th St and Exterior Street).



3. Another low-lying area is the largest food distribution market of its kind in the world, feeding up to 22 million people across the region -- the Hunts Point Cooperative Market. With the exception of Hugo Neu Sims[1] which has invested in building a wetland wall of green infrastructure, most other areas including the food market, utilities and transportation were flooded during the Sandy surge, and remains unprotected from a surge.

4. Other parts of the Bronx will also be severely impacted by a surge. While your study is about coastal, you can see by viewing the NYC Stormwater Flood Maps, that inland flooding is prevalent. The population density and the recent increase in construction has only added to the situation. Managing inland flooding can help mitigate coastal flooding.

METHODS

5. We advocate watershed management and natural shoreline features that dissipate energy from storm surges in order to integrate coastal and non-coastal flood mitigation planning. We also observe that the succession of seawalls up the East River and the Harlem River are designed to absorb the force of storm surges diverted from Lower Manhattan seawalls. We ask for approaches that dissipate the force of storm surge at first landfall or impact instead of transferring that force upriver.

6. Engineering With Nature® is the intentional alignment of natural and engineering processes to efficiently and sustainably deliver economic, environmental, and social benefits through collaboration. As you know, the USACE New York District is including nature-based features as part of the plan to reduce flood risk. Let's use ENW as one of your alternatives in the Tier 2 Environmental Impact Statement.

7. We favor the "environmental greenway" as a solution, not only to clean water, but to absorb the impact of a surge. By utilizing green infrastructure to design a continuous ribbon of greenways, we filter runoff into the ground toward the river's base flow, rather than over the land gathering pollution until it goes into the river. It also allows the public access our community so fervently wants

[1] https://thegaiainstitute.org/Gaia/Green%20Wall%20Hugo%20Neu.html

and needs. Using the stand-alone Oak Point Link as part of the environmental greenway is an excellent project to repurpose.

BRONX FACTS

8. Furthermore, managing the antiquated and overwhelmed stormwater management system offers great insight into the water budget and route. Normally geography is adequate, but in the old urban environment of our City, more is needed. Of the 72 outfalls along the Harlem River, most are from Manhattan, and discharge into the River. Kindly add a review of the sewersheds, newer buildings with their separate stormwater systems, and the federal highway system such as the Cross Bronx Expressway and the Major Deegan Expressway that meet at the edge of the Harlem River.

9. Because of the close connection between coastal and inland flooding caused by recent storms, we recommend that this project team work closely with NYC Mayor's Office of Climate Justice and Resilience and the NYC Department of City Planning to coordinate and integrate complementary mitigation effects that can enhance the productivity of shoreline features and build infiltration capacity in floodplain communities, most of which quality as environmental justice neighborhoods. Given what we have learned from Superstorm Sandy and Hurricane Ida, a new era of 100-year storms requires this integrated approach and that climate change response should not be governed by separate jurisdictions.

10. Landmarks and landmark projects potentially impacted by the study include the shorelines of Fordham Landing, the Daylighting of Tibbetts Brook, Roberto Clemente State Park, New York city Department of Parks and Recreation Bridge Park North /South, and Mill Pond Park; the New Your State Department of Environmental Conservation Open Space plan for Port Morris and Mott Haven shorelines, and new businesses at the New York State Department of Transportation Harlem River Yards.

11. Kindly add Climate Change first and foremost to criteria. As you are the caretaker of our wetlands, the Army Corps of Engineers do not have to be reminded that wetlands and plants adapt and grow. Why then are you concentrating on rocks, concrete, bulkheads, or gates? Building hard surfaces with concrete and cement will not solve problems, but only add to them. Cement manufacturing accounts for 8% of the world's CO2 emissions. Concrete, which is made out of cement, is the most widely used substance on Earth -- behind only water; the third largest consumer of energy; and the second largest emitter of CO2 when looking at industrial players alone.

> "*As a material that creates the majority of the world's bridges, roads, dams, and construction, concrete releases an extreme amount of CO2 each year. It's the highest consumed product on earth besides water. Until the overall emissions are cut worldwide, the environment will continue to be polluted with over 4 billion tonnes of carbon dioxide annually due to this industry.*"[2]

12. Finally, your analysis is centered around measuring Census Tracts. Census tracts are useful to add population, not as a percentage of census tracts used. For analysis you would use the actual counts. Census Tracts are not equal in population. This is particularly critical in identifying areas of low-income, English as a Second Language and/or otherwise disadvantaged persons (young, old, or living in polluted Environmental Justice areas in NYC).

[2] "Concrete is Worse for the Climate than Flying. Why Aren't More People talking about it?", June 24, 2022. Inside Climate News. LINKED HERE

SUMMARY

In summary, we urge first steps to utilize EWN and GI to assess and identify problem areas. Then and only then, use the gates as a last resort. We believe this can cause leaders to accept what the future holds, instead of relying on the TSP. In other words, for each and every alternative, we urge alternative analysis in the context of the Army Corps invaluable 'Engineering with Nature' program. Short-and long-term carbon budgets are essential to all efforts to address sea level rise, and relevant here, as well. Every structure should also be specifically evaluated in terms of its contribution to ecological productivity to the estuary, to biodiversity, and reflect any negative impacts or enhancements to the fishery. Specifically, every in-water structure needs to be graded in terms of its value as subtidal or intertidal habitat, with comparisons of alternative surfaces in terms of increasing and/or decreasing potential biota coverage, biomass, diversity, and contribution to the fishery.

Thank you for this opportunity to comment. We look forward to your response to our comments.

Sincerely,

Karen Argenti	*Robert Fanuzzi*	*Chauncy Young*
BCEQ Secretary	BCEQ President	HRWG Coordinator