



October 20, 2019

Re: ULURP No. C 190357 PQM (East Side Coastal Resiliency)

Dear Borough President Brewer and Councilmember Rivera:

Thank you for your advocacy for our community's concerns around the East Side Coastal Resiliency project. We especially appreciate your action in bringing in the independent consultant when the City did not.

After reading through both the Deltares report and the new phasing plan, however, we still have significant concerns about Preferred Alternative 4.

A primary purpose of the independent review was to get a second opinion on the effectiveness and impacts of the flood protection in Alternative 3 vs Alternative 4. Dr. Gehrels says that without background documents:

- It is not possible to validate the assertion in the FEIS that all Alternatives provide similar protections (p 41).
- It is not possible to evaluate the City's conclusion that Alternative 4 can be completed faster and with a greater degree of certainty (p.38).

The report also presents a new claim by the City that the berm in Alternative 3 would be overtopped during a 100-year storm, flooding the FDR Drive and areas further inland. The City also suggests that even Alternative 4 would be overtopped (although the park would absorb the water and prevent it flowing into the FDR Drive and residences). But Dr. Gehrels adds: "The City indicated the effect of the design on overtopping had not yet been modelled" (p. 33). Whether the proposed levee will be breached by a surge during a 100-year storm is no small issue. The Deltares report uncovers an alarming lack of clarity on this central question.

Finally, the report explains that the City is still doing "modeling and analysis" to be sent to FEMA later this year – but which was not part of the decision to choose Alternative 4! (p. 41)

In other words, the City is not even finished investigating the safety and efficacy of Alternative 4, and what they do know is not publicly available. We have no proof that Alternative 4 is the protective plan we need, or that Alternative 3 is not a better choice. We therefore ask you to demand:

- Immediate release of “East Side Coastal Resiliency Project, Coastal Hydraulics Report, Arcadis, 2015.”
- Immediate release of the "value engineering report," the internal report produced by the City that they say justifies Alternative 4 as a faster approach.
- Immediate release of all other documentation that was used in the decision-making process, such as the technical studies, hydraulic and geotechnical field surveys and/or modelling, that form the technical basis of the project design.
- More information about additional modeling and analysis “that is currently underway and will be included in the Conditional Letter of Map Revision submission to FEMA later this year.”

We believe all of the above information should be made public immediately, and that no further voting should take place until both Deltares and those voting on ULURP approval have been able to thoroughly review and judge whether the evidence supports the City’s claims.

We also remain concerned about the health, safety, and well-being of our community before and during construction. We ask you to support further changes:

- IFPM (Interim Flood Protection Measures)
- Building for 2100, not for 2050
- Reducing the total amount of destruction to only what is absolutely necessary, lowering the impact on biodiversity, and providing funds for mitigation of NYS rare species
- Details on robust air, noise, and vibration monitoring
- Details on the phasing proposal
- A clear plan for the Lower East Side Ecology Center, including the Fireboat House and the Compost Yard programs, both during and after construction
- Clear plans and funding to save habitat in construction areas
- More and better mitigation for lost open space, including:
 - Better re-routing of the Greenway with safe alternatives for pedestrians as well as cyclists
 - More investment in smaller local green spaces
 - Free transportation to larger open spaces such as Randalls Island and Governors Island
- A Community Advisory Group with meaningful input on planning, design and oversight
- Studies of inland flooding and drainage to confirm that flood protection measures will not worsen inland flooding, and flooding outside of the ESCR region

Given the lack of corroboration for the City’s claims, and the outstanding community concerns about the timeline and impact of the project, the East River Alliance believes that no vote should take place until both Deltares and those voting on ULURP approval have been able to judge whether the evidence supports the City’s position.

Sincerely,
Steering Committee, East River Alliance