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Oct. 9, 2015

Office of Flood Risk Reduction Measures
NJ DEP
Attn. Dave Rosenblatt
501 E. State St.
Mail Code 501-01A
P.O. Box 420
Trenton NJ 08625-0420

Dear Mr. Rosenblatt:

Thank you for the opportunity to comment on the [Draft Scoping Document](#) for the Hudson River Rebuild By Design (RBD) project: Resist, Delay, Store, Discharge.

New Jersey Future is a nonprofit, nonpartisan organization that promotes responsible land-use policies to help revitalize cities and towns and create livable, resilient communities for all New Jersey residents. We are very interested in ensuring that this project maximizes the opportunity to keep people and property along the Hudson River safe from future natural disasters.

Our comments are focused on five main areas including the funding allocation, sea-level-rise projections, the concept screening matrix, vulnerable populations, and public involvement.

Funding Allocation

According to the draft scoping document, "[w]hile the funding allocation awarded in the CDBG-DR grant provides for the implementation of Phase 1 of the project, which includes the *Resist* component, the EIS and feasibility analysis will examine three Build Alternatives, as well as a No Action Alternative, for the entire comprehensive approach." Even if there is not enough funding for the entire project, the Phase 1 floodwall will not address flooding caused by smaller rainstorms, and perhaps could impede drainage.

Recommendation: Mitigation measures for inland flooding from rainfall events, not just coastal surge, must be integrated into the project if the goal of the funding is to create a comprehensive flood solution that will also address the flood risk that comes with precipitation. The document should explain explicitly how the funding will address interior flooding.

Incorporating Projections for Sea-Level Rise and Precipitation Events

The changing nature of flood risks, including risks that are associated with sea-level rise, demands conservative standards that will withstand the test of time and the forces of nature. The document discusses rising sea levels and the potential for this phenomenon to result in greater frequency of coastal flood events; however, it fails to make clear what sea-level-rise projections are to be used to guide the project.

Recommendation: To ensure that the project mitigates risks from coastal and inland flooding and stronger storms, New Jersey Future recommends including in the scope:

- An official adoption of sea-level-rise projections for 2075 and 2100
- A detailed analysis of the flooding vulnerabilities today, in 2075 and in 2100, incorporating a range of projected extents of sea-level rise (low, medium, high) and projections of future precipitation patterns.
- Articulation of methods to protect infrastructure, not just residences, from current and future flooding risks so that when evaluating alternatives, there is transparency in how vulnerable infrastructure, such as storm sewers and outfalls, will be addressed.

Concept Screening Matrix and Co-Benefits

To determine the goals and therefore the matrices used to evaluate alternatives, it is essential to decide from the beginning what is being protected (residents, businesses, the most vulnerable, private property, infrastructure such as hospitals, roadways, mass transportation facilities, water supply and sewage treatment, energy distribution, etc.) and how priorities will be set.

Recommendation: The concept screening matrix needs to be explicit in identifying project goals and who is benefiting. In addition, since residents and businesses will be most extensively affected by the project, these stakeholders should have the opportunity to provide input into the development of the matrix itself, not just the final rankings from the matrix. Co-benefits of flood control projects should be clearly articulated and quantified, and considered in cost-benefit analyses. For example, by incorporating “green infrastructure” practices into efforts to control stormwater, communities and property developers can reduce energy costs, diminish the impacts of flooding, improve public health, and reduce overall infrastructure costs.

Vulnerable populations

The Socioeconomics and Environmental Justice technical sections say that social, economic, and demographic factors will be analyzed to determine if the project will have a disproportionate adverse environmental impact on vulnerable populations.

Recommendations:

- Studies should be performed that document how many people are currently living in locations vulnerable to flooding, whether if, as a result of the implementation of the projects chosen, residents, particularly low- and moderate-income and other vulnerable populations, will be protected from sea-level-rise-based flooding projected for 2100.
- During the hazardous-waste investigation, risks specific to vulnerable populations should be analyzed, findings should be distributed to these communities as well as the public as a whole, and discussed at a public meeting.
- Given the fact that flooding problems are not just at the water’s edge and that LMI and other vulnerable residents must be protected from flooding, funding should be allocated for both coastal and inland flooding and not be spent solely to protect high end housing along the Hudson River Waterfront.
- Social workers in the target areas should be contacted to assist with identification of vulnerable communities and with communicating information about the project.
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Public Involvement

Section 6.1 of the document refers to the project's Citizen Outreach Plan (COP) as the public involvement plan that will be implemented.

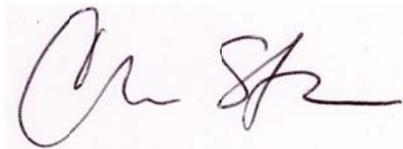
Recommendations:

- New Jersey Future reiterates the recommendations we made for the draft COP. Citizen Advisory Groups (CAGs) must be truly inclusive and allow for genuine dialogue, through clarification of composition, authority and meeting structure. For example, not only must those residents recommended by local officials be included, all residents not on a CAG should be encouraged at least to observe the dialogue. This can be accomplished by making public all CAG meeting dates, times and places.
- It should be transparently stated how the Dept. of Environmental Protection (NJDEP) and engineering consultant Dewberry will respond to comments and recommendations made by the CAG and the general public.
- As stated above, a proactive outreach and engagement program should be developed to ensure participation from vulnerable populations.

New Jersey Future looks forward to working with NJDEP, Dewberry, and the cities of Hoboken, Jersey City and Weehawken to assist in the design and implementation of a successful comprehensive resiliency initiative. We commend Hoboken Mayor Dawn Zimmer for her forward-looking flood resiliency initiatives and for creating a culture of openness that encourages inclusive community dialogue and outreach, and we hope her example is followed as the project moves forward.

Thank you for your consideration. If you have any questions, please don't hesitate to contact me at csturm@njfuture.org or 609-393-0008, x114.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Sturm", written over a light pink rectangular background.

Chris Sturm
Senior Director of State Policy
New Jersey Future