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Mr. Robert Smith and Mr. Mark Lulka
The U.S. Army Corps of Engineers, New York District
Planning Division-Environmental Branch
26 Federal Plaza
New York, NY 10278-0090

VIA ELECTRONIC MAIL

October 18, 2016

Re: Fire Island to Montauk Point Reformulation Study Draft General Re-evaluation Report/Draft Environmental Impact Statement

Dear Mr. Smith and Mr. Lulka,

It is with great pleasure that I submit comments for the draft Fire Island to Montauk Point Reformulation Study Draft General Re-evaluation Report/Draft Environmental Impact Statement ("FIMP") As a preliminary observation, kindly note my appreciation for the public process undertaken by the Army Corps ("the Corps"). An initiative of such magnitude, so critical to the preservation and protection of our coastline, can only be effective if it continues to garner and rely on local input. In addition, after decades of planning, forward movement at this time is welcome and appreciated, as we face impacts of climate change and the threat of increasingly severe weather events.

As a representative of a district that stretches from Center Moriches to Montauk, with coastline of 320 miles, I can attest to the importance of the FIMP to our community. Our coastline is of paramount importance to the people of the Second District; it has shaped our economy, environment, and the very culture of our communities. This project is vital to the long term economic health of the East End.

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Southampton Town Supervisor Jay Schneiderman, East Hampton Town Supervisor Larry Cantwell, Westhampton Beach Mayor Maria Moore, and others from the Second District have submitted thoughtful comments based on a keen understanding of local needs born of experience and careful consideration. I echo and would like to emphasize many of the points they have each made in their respective submissions.

Southampton

Beginning with Southampton, the raising of Dune Road is critically important to the long term logistical success of this plan. The dredging of the Shinnecock Inlet to provide 2 million cubic yards of sand to nearby beaches every four years or when it becomes necessary to maintain beach profiles will necessarily take a toll on local transportation infrastructure. In order to reach the objective beaches, Dune Road will need to be traversed by heavy equipment. This road is a low lying road which floods in even minor rain events and lunar cycles, and could prove impassable in many situations. Therefore, it is necessary to include raising the road as a critical component of the plan. The Corps has recognized maintaining proper byways in including similar plans for Mastic, Lindenhurst, and Amityville. The Town of Southampton has analyzed the cost of raising Dune Road and found it would cost approximately $7 million for a project covering 7 miles of road.

The largest borrow areas to be accessed for beach renourishment are located off the Southampton Town coastline. These sand deposits should be reserved for beaches in close proximity to the respective borrow area.

It is proposed that 120,000 cubic yards of sand be deposited on Potato Road in Sagaponack Village every four years to offset erosion. The plan is contingent however on implementation of a local pond opening management plan for Georgica Pond, which is not within the jurisdiction of the Village, or Southampton Town, but rather East Hampton and the East Hampton Town Trustees. A question arises as to how Potato Road is to be protected should the Georgica Pond plan not be funded or implemented. Consideration must also be given for an opening management plan for Mecox Bay and the related maintenance of beaches in Water Mill.

East Hampton

Regarding portions of the draft affecting East Hampton, I am in agreement with Supervisor Cantwell that the plans to protect Montauk are inadequate as presented. Proper consideration must be given to both seasonal and long-term erosion, as well as potential impacts of sea-level rise, and the recommendation for 120,000 cubic yards of supplemental sand placement every four years is wholly inadequate. The current recommendation does not fully consider the extent of both potential damage to property and potentially devastating economic impacts that follow significant erosion. As noted at the recent public meeting in East Hampton,

an adjustment must be made to the Cost Benefit Analysis utilized to determine the level of support for that area, to include recreational benefits, allowing for a far greater investment in the protection of downtown Montauk.

The Town of East Hampton completed the 'Downtown Montauk Beach Restoration and Flood Damage Prevention Report' which sheds further light on the aspects of the plan that are deficient. The report recommends that the project be expanded to provide 759,000 cubic yards of sand to 6,000 feet of shoreline plus an additional 414,000 feet every four years. According to the report, this will properly strengthen the coastline to deal with the seasonal erosion and by damage caused by recent storms. Furthermore, the report found that the FIMP study did not adequately account for the economic benefits of widened beaches, flood damage prevention, and by avoiding damage to many buildings in downtown Montauk.

Westhampton Beach

The residents of the Village of Westhampton Beach are very concerned with the proposal to shorten 13 groins in that village by up to 100 ft. The current state of the Groins in the village it satisfactory for protection of the current economy and residents desire that they be left in their current state. I am in agreement that burdening a community that is currently stable is unnecessary and could lead to substantial harm.

Thank you for consideration of the critically important input of the local residents and public officials in crafting this crucial plan for our region, and for the long term sustainability of our coastlines.

Sincerely,

Bridget Fleming
County Legislator, Second District

BF: djd