

City of Hoboken – Rebuild By Design-Hudson River Citizen Advisory Group

Co-Chairs:

Ravi S. Bhalla, Esq.
Carter Craft
LaTrenda Ross

CAG Members

Melissa Abernathy
Brian Battaglia
George Bennett
John Carey
John P. Carey
Jaclyn Cherubini
Peter Cossio
Bo Dziman
Bob Ferry
Hon. Tiffanie Fischer
Gerald Fitzhugh
Ray Guzman
Dr. Tom Herrington
Ron Hine
Gary Holtzman
Rev. Marvin Krieger
Vito Lanotte
Richard Mackiewicz
Fr. Bob Meyer
Rose Perry
Dr. Meika Roberson
Renee Russell
Paul Somerville
Noelle Thurlow
Rich Tremittedi
Ruthy Tyroler
Francoise Vielot
Dana Wefer
Richard Weinstein, Esq.
Ora M. Welch

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Mr. David Rosenblatt, Director
Office of Flood Hazard Risk Reduction Measures
New Jersey Department of Environmental Protection
401 East State Street, Mail Code 501-01A,
PO Box 420
Trenton, NJ 08625-0420.

Via email: rbd-hudsonriver@dep.nj.gov

Dear Mr. Rosenblatt,

On behalf of the Hoboken Community Advisory group for the Rebuild By Design Hudson River Project we submit the following comments on the Draft Environmental Impact Statement (DEIS) for the Rebuild By Design (RBD) Hudson River Project.

We also include some additional questions which we ask you to answer before the Record of Decision is issued. In the spirit of constructive collaboration, we also offer some suggestions for improving the process going forward.

This Rebuild By Design project marks an important milestone in the evolution of our city and our neighboring communities. We also believe that this Rebuild By Design process is an important milestone in our nation's effort to adapt and become more resilient in the face of climate change. We have also included additional contextual information for your team to include in the final DEIS. We believe the record of this project in its documentation ought to be as complete as possible in order to provide guidance for our community as well as other communities who have to work through this process in the future.

We support the alignment included in Alternative 3, HOWEVER:

Due to a number of factors which we attempt to articulate below, we still do not believe the State or their consultant team is on the right track for developing a comprehensive plan that can protect Hoboken from storm surge and precipitation. The fact that we still feel this way, more than 18 months after submitting our guidance on the Draft Scope of Work on this project, indicates that we are not being heard. Red Flag!

We do feel that Alignment 3 is the best choice for helping us move forward at this time. However, we also believe there are many other aspects of the strategy and plan at this point that are causes of concern, or confusion, or in some cases, are outright objectionable.

Because the current version of the Executive Summary in the DEIS omits some the CAG's long-stated Goals, we still do not agree that the implementation strategy described here is what our community needs most. Thus we have some major concerns as to whether this project and the resources that may come with it will be optimized.

At this critical time as we are all trying to move towards a Record of Decision that will allow this much-needed project to proceed, we ask the State to accept our comments on the document enumerated below, particularly in terms of Goals and Objectives, and otherwise respond to the rest.

Let us open by saying that never in our lifetimes did we ever think we would have the opportunity to participate in a project like this Rebuild By Design project. This project brings the potential to do so much good for so many of our neighbors. However, we also have to keep in mind that isn't simply about protecting coastal residential property, and this isn't just about maintaining parking spaces, rather it is about helping to ensure the health and safety of more than 60,000 people who live in a vulnerable, low-lying area.

1. The Draft EIS as Written Does Not Accurately Reflect the Goals of this Project.

As stated in our CAG comments to the Draft Scope on October 7, 2015, we have asked specifically to establish the purpose of this project to be the development of a "Comprehensive Strategy." (Letter from Hoboken CAG to NJDEP 7 October 2015, page 1, para. 3). Therefore we fundamentally disagree with the language in the Executive Summary (ES-1, paragraph 4) that states funding should be used only "for the Resist components" and that "(t)he Delay, Store, Discharge elements would be implemented separately... as funding becomes available." This is absolutely wrong for a number of reasons.

- a. The approach described here runs completely counter to the original vision for the RBD project. It was because of this initial integrated, comprehensive vision that we were awarded the funds. This fact is public knowledge. Therefore the project moving forward should adhere to this comprehensive strategy, rather than presuming that other projects or mechanisms will deliver those benefits;
- b. the approach described here ignores the explicit goals of the CAG, which we articulated clearly in our comments on the Draft Scope of Work for the EIS, submitted to the State on October 7, 2015, and have repeated at many additional points in the public process;
- c. Recent investments in infrastructure have already increased our community's capacity to prevent catastrophic flooding. For example, since the great Sandy flood, wet weather pump capacity of Hoboken has increased 160% with the opening of the 11th Street pump

station at Maxwell Place. Therefore the continued focus solely on Resist seems ever more outdated and myopic.

d. One piece of advice that is circulating in virtually community grappling with these issues is “Do not base your flood prevention program solely on the *last* major storm that happened.” Yet this appears to be exactly what we are doing.

e. The DEIS fails to acknowledge or address the obstacles of finding and securing the required \$2 million in annual maintenance for the proposed Resist infrastructure. Not only will this require the creation of new or adapted Administrative and Management mechanisms to physically deal with the system, the new costs that will come with any new system such as this may pose a financial burden for homeowners and residents in the project area, many of whom are on fixed and limited incomes and have seen very large property tax increases in the past decade.

f. Trends in every virtually every aspect of life are shifting from central and concentrated to distributed and mixed. From land use and zoning to transportation and energy, all of these areas of our daily lives are going multi-modal, distributed, locally-sourced, or otherwise mixed use. There is no one we speak to outside of this project that believes Resist is the only way to go. Yet certain voices with the Project leadership cling to it, despite the fact that technical experts involved in this and similar processes agree that the continued emphasis on the Resist strategy is the wrong approach.

g. the approach described here completely contradicts guidance we have been given by US HUD when we were told that "one of the drivers in the project is the comprehensive approach needed to help reduce risk from precipitation events." (Alyson Beha, US HUD, September 17, 2015)

At this critical point it seems that this project is being led on a very narrow and biased course, one that discards the original vision and ignores disregards fundamental goals of the CAG. Looking ahead, we fear that we will all become severely limited in the flexibility of how we implement the elements of Alternative 3 if this is not corrected. It should be clarified both in this document as well as the Record of Decision. Narrowing the Scope to “resist” at this time is more likely to lead us to a project that fails our community in terms of increasing our physical and social resiliency.

Therefore, we want to state clearly and again, that we remain convinced that the integrated approach of Resist/ Delay/ Store/ Discharge should remain the core strategy of the project for now and through the next design phase.

If the project strategy is based on the FEMA flood maps, we should be looking across the river at the strategy taken by New York City who have chosen to generate their own, more locally precise data to inform their planning. When the Preliminary Flood Insurance Rate Maps were released for NYC, the City actually challenged the federal government’s data. They appealed successfully and were able to show FEMA that the area at risk for flooding was much different than what FEMA was projecting.

Here in New Jersey we seemingly rushed to accept FEMA's map changes shortly after the storm happened. It does not appear that we have made any effort to challenge FEMA's new map.

Fortunately for Hoboken we have benefited from the efforts of Stevens Institute of Technology, who developed a computer simulation of how the surge flowed overland across the project area. This model was sourced with data from local residents who actually observed the conditions. This model is much more finely grained and detailed than the data FEMA uses to draw their maps. It should be noted and acknowledged in the DEIS document that some of the area in the proposed north and south alignment of the Resist structure actually did not flood during Sandy. The fact that the current Resist-only strategy proposes to spend precious and limited funds in areas of Hoboken that have never flooded is another indication that the present Resist-only strategy in the DEIS document is off the mark.

We have been told that in the Design phase to come that additional modelling work will be performed. That will give us more and important information on overland flow, for instance. We can also expect that updated cost estimates will be generated during the next phase, followed by eventual Construction Bids. As that information becomes available we will have additional and subsequent opportunities to narrow the physical scope of elements that actually get built.

In summation, we feel strongly that the integrated vision of a comprehensive urban water management strategy MUST remain embedded now and codified in the Record of Decision. We need to maintain the flexibility for now. As new data and information becomes available we can then focus where and on what strategies and overall project elements in what locations we finally focus the remaining implementation funds from the original \$230M allocation.

2. ES 1.0 - The DEIS Needs to Include Mention of Pilot Projects Also in Section 3.0

- a. Section 1.0 (page ES1) references that Phase 1 of the project "will include... (2) studies and pilot projects [and] (3)... greenbelt CSO wetland pilot project. This important content therefore should be reflected in the Goals and Objectives (3.0). Specifically, the goals of "Contribute to Community Resiliency," "Delivery of Co-benefits," and "Activation of Public Space" should all be revised to include language such as "including pilot project(s). These pilot projects themselves will go a long way towards the overarching goal of increasing community resilience, especially when one considers that by the time this project is built 10 years will have passed since the storm which triggered it all.
- b. Section 1.0 (page ES3) contains a blatant misstatement or falsehood. When the report states, "... the current round of funding is for Resist only," we believe that is completely false, in addition to being biased and wrong. As cited above, we have raised this issue with US HUD directly on more than one occasion. We have been told each time this is not true.

We want to optimize the Resist structure. We understand there may be opportunity costs if we do not invest adequately in Resist here at the onset of this project. However, the focus of the project solely on Resist at this stage ignores the fact that our local capacity to move water

out of the city has increased tremendously since 2012. We have also enacted Zoning reform to help phase out residential dwellings in basements. This takes people out of harm's way. The project needs to consider what is happening in Hoboken now to help address this vulnerability, not simply focus on what happened 4.5 years ago.

3. ES 3.1 Goals and Objectives Ignores the Need to Protect Vulnerable Populations

The document fails to acknowledge that one of the most fundamental goals of this project is to "protect vulnerable people." This project is not supposed to be a coastal hardening strategy or a lets-protect-the-people-on-the-waterfront strategy. As stated in our CAG comments on the Draft Scope in 2015, we specifically asked for this goal to be embedded in the project. To leave this goal completely out of this Draft EIS does a huge disservice to members of our community who suffered the most and will suffer again, should we fail to address their most local needs (CAG comments October 7 2015, page 2, para. 4). This vulnerable population also needs to be kept in mind as the process proposes the creation of infrastructure that will increase the financial burden on residents to cover operations and management costs.

4. ES 3.1 Goals and Objectives Ignores the Need to Define or Quantify Goals for Water Management

In our earlier comments on the Draft Scope for the EIS, we asked the State to "more clearly define the standards or goals we are trying to reach: xx inches of rain per yy hours sustained over 24 hours? ZZ feet of storm surge or flood tide?" For such a complex project and document, it would make the process more transparent and comprehensible if this information were included here at the outset.

We believe that the key question at this point is not "how do we keep 470 million gallons of water out," but rather, "what volume of water coming in, and at what rate, and for what duration, will cause catastrophic flooding?" We have to accept the fact we cannot keep all the water out. Every flood prone community knows this already. The question is really, "what can we handle?" Rather than focus on the 470 million gallons as a target, we believe we should be asking these questions:

- What volume of water coming into Hoboken over what period of time will flood the hospital again?
- What volume of water coming into Hoboken over what period of time will flood the evacuation shelter (Wallace School) or the primary food distribution point (Hoboken High School)
- What volume of water coming into Hoboken over what period of time will flood the fire stations or police facilities, including the municipal garage?
- What volume of water coming into Hoboken over what period of time will flood the Hoboken Housing Authority Campus?
- What volume of water coming into Hoboken over what period of time will knock out our emergency response agencies' ability to respond to calls?

Of course there are other vulnerable locations that could be added to this list. For all the resources that have been spent on creating a new flood model, it should be pretty easy to answer these questions given we are only talking about a relatively small number of locations/ areas. As volunteers who have contributed a lot of time and energy towards the success of this project, we hope you have answers you can share with us before you push us towards a Record of Decision.

5. ES 4.0 - Confusion between "Minimize" and "Reduce"

The Purpose of this project as stated on page ES4 is to reduce the flood risk in the study area. The CAG agrees. Under section ES 3.0, however, the document instead mentions "minimizing" the flood risk from coastal storm surge and rainfall flood events." In our CAG comments to the Draft Scope on October 7 2015, we did not ask for the risk to be "minimized" (but we did ask specifically to establish the purpose as the development of a "Comprehensive Strategy.)

Given so many variables, plus trends in sea level rise, rainfall, and other factors, we feel it is unrealistic and irresponsible to even use language such as "minimize" in the context of this project. There are too many unknowns and we should not give people any false assurances that risk can be minimized – unless we are enabling them to relocate out of the flood zone. We also feel that use of this word “minimize” sends the project irreversibly down the path of spending excessive amounts of resources on Engineering fees, and towards a goal that cannot even be achieved. To preserve the flexibility we need moving forward we think we need to change the word "minimize" to "reduce" on line 2 of Section ES 3.0.

6.1 ES 5.0 Overview of Alternatives – Active Recreation Program as well as Bio-Retention

The proposed program for the NJ Transit site next to the Hoboken Housing Authority desperately needs to be re-thought. This element, which we were happy to see added to the project, came along quite late in the process. In reviewing Figure ES.12, it becomes clear that perhaps some active recreational activities could be programmed in this space. The Hoboken Housing Authority has one of the largest populations of young people in the City. They need a place to play. While the baseball fields are adjacent to the east, those fields are often completely booked or otherwise closed. There are a growing number of examples around the world of areas that are designed for active recreation, but also have a detention or water storage function for when it rains. For this 4-block stretch of land we think the need for active recreation here is significant and should not be ignored.

We also think it is worth addressing our local capacity for maintaining things like basketball or handball courts versus a bioswale. While we appreciate the enhancement of natural habitat, such as nesting and feeding areas, we also worry about mosquitos and mosquito-borne illnesses such as Zika and West Nile becoming a health problem.

6.2 ES 5.0 Overview of Alternatives – Pump Stations

The proposal for new outfalls in Weehawken Cove needs to be re-thought, and very carefully. The entire Cove area has been envisioned for more than a decade as the heart of recreational

boating in the Hoboken-Weehawken area. It is also notable that the water in the Cove does not circulate very well. There are at least 3 years worth of data collected there as part of the regional “Citizen’s Water Quality Testing Program of the NYC Water Trail. As we all know, pollution – where there is no dilution – stays put. Because this cove is well out of the main body of the Hudson River’s current, putting in two new outfalls is sure to harm ambient water quality. Even where NHSA has installed signage and computer hardware to caution river users about poor water quality, these systems do not always function well. Therefore we feel the project should a) explore all alternatives to contributing more outfalls here; b) minimize any effluent that gets discharged here and, if the outfalls are deemed necessary, design them in such a way that water quality next to the existing beach will still be enhanced to support primary access to the water that the Clean Water Act was created almost 50 years ago to help deliver.

7. ES 5.0 Overview of Alternatives – Construction and Implementation

The fact that the Resist infrastructure proposed here will need 44 months of construction is another indication that the State is moving in the wrong direction. That basically leaves 18 months to bid out the rest of Design work, produce the Designs and Construction Drawings; Bid out Construction, Award the Construction, and then Mobilize to begin work. To imagine all this happening in 18 months, without even accounting for filing delays, pulling permits, or (un) expected hazardous materials, etc. is yet another reason to pare back on the Resist Strategy.

8. Photograph ES.2 – Wildlife along the Hudson River

The Hudson River is a national treasure. For all the river systems along the east coast of the US, it is believed only the Hudson has retained the diversity in its fish population that existed before the Industrial Revolution. Sturgeon, the fish species that has lived on this planet since the dinosaurs, is an iconic representation of just how vital this natural resource really is. Horseshoe crabs come ashore at Maxwell place to lay their eggs by the millions. Naturally occurring oysters can be seen on the rocks at low tide in the Cove. All this biodiversity abounding, within the project area, and the best photo we can come up with is a seagull on top of a piling? #uninspired

9. ES 7.0 Known Areas of Coordination - Urban Design

To mention the “numerous” urban design charrettes that were held is a bit of an exaggeration. The number was actually 2. The materials that were employed were quite basic. The models, once they were used, were helpful. But it was all quite primitive. We believe the areas including the Weehawken Cove Park and the NJ Transit Bioswale need much, much more attention and discussion moving forward. We need to get more diverse populations involved.

10. Figure 1.5 Preliminary FIRM Flood Map

This map illustrates two areas that could potentially be removed from the Resist strategy, freeing up millions of dollars and enabling the project to get back to the comprehensive approach that won the funding in the first place.

- a. At the north end of Hoboken, the entire resist alignment from 13th and Washington north to the alley and west to Bloomfield should be removed from Phase 1 and the Record of Decision for the initial work. As this map shows, this area only face minimal flood risk. It is not even in Zone A/AE. This would obviate the need to undertake substantial utility relocation, contractual and easement issues with adjacent property owners as well as eliminate the disruption that will come with the construction in this area.
- b. At the south end of Hoboken, adhering to Option 1 for the southern alignment will allow the project to link to the higher ground between Park Ave and extending to Henderson Street. As with the topography at the north end of town, here there is a 5 block stretch of land extending east-west that is similarly outside of the AE floodplain.

By removing both of these areas from the Resist alignment, the project could be shortened by over 2,000 linear feet. Saving time and many millions of dollars, with what most experts would say is only a negligible reduction in flood risk. If your model is able to answer the questions posed under #4 above, this should be relatively easy to calculate. Then probability can be determined. If your model cannot show this then this is yet another reason to leave the flexibility so as new information comes in the right decision can be made.

11. 2.3 Goals and Objectives – Activation of Public Space

This goal adds additional credence to the need to explore active recreation opportunities and design strategies in areas such as the NJ Transit right of way by HHA.

12. 3.2 Description of Concepts

- a. Figure 3.7 All Concepts “Subway Map” – appears to be an older version as it does not show the Bio-swale by the NJ Transit property along HHA
- b. DSD components shown on the map should be prioritized with preference given to locations that are at or adjacent to Schools, public facilities like Parks and the Library, and other community facilities
- c. It has been suggested that the intersection of Park and 4th Street on Church Square Park be considered. Topography of the Park shows that close to ¼ of all the rainfall runoff in the entire park flows down to a storm drain at this location. Bypassing one other storm drain along the way. [aside: did the Design Team conduct a detailed topographic survey to inform their suggested locations?]

13. Alternative 3 Figure 3.5.6 – Location of Outfalls

The proposed location of these outfalls appears to be the most harmful to water quality in the immediate vicinity of the beach. The beach is the water access point for the Hoboken Cove Community Boathouse, Resilience Paddlesports, and many private boaters. The project proposes to put an outfall on either side of the beach, one to the north and one to the south. This is extremely insensitive, shortsighted, outrageous and must be re-thought.

14. Public and Agency Coordination Groups

A very important group in this process is the (TCT) Technical Coordination Team comprised of federal and state agencies with jurisdiction and subject-matter expertise to provide guidance on environmental concerns. (**Table 3.1**) Early on in this process we suggested a joint meeting of the CAG and the TCT. That never happened. Looking back we feel that should have happened.

We in the community are on a very steep learning curve with this project. We believe that a discussion with the TCT along the way would have increased the technical knowledge base within the community. Society needs this. That would be a discussion where the focus is on the content and the material. The discussions we have with the CAG and the project team, however, seem to be more driven by the NEPA process and the project schedule, rather than the actual substance of these issues. Focus on process rather than issues is a problem that all of us should seek to help others improve upon. We owe it to our neighbors, fellow citizens and American society as a whole, not just to administer this process but to try and improve this process for *the next community. Looking ahead we believe a joint meeting of the TCT and the CAG should be a requirement of this process.

15. Section 3.6 Build Alternatives pp. 3-32 as regards Alternative 2, and 3-37 as regards Alternative 3

"... Alternative 2 (and 3) leaves portions of the city streets and sewer system unprotected. To prevent water intrusion into the existing sewers under Alternative 3 a separation of the sanitary/stormwater collection system is proposed by the construction of a high level storm sewer collection system. In addition to the installation of this new storm sewer system, the existing NHSA combined sewer inlets and manholes would be sealed and lined. This proposed drainage would be designed to prevent additional sewer backflow that could cause major flooding issues within the Alternative 3 protected areas during a storm surge event. Stormwater collected in this high level storm sewer system would gravity flow into the Hudson River."

We have two concerns here:

- a) If the flood condition has caused water to overtop the bulkheads, then it seems that gravity will be insufficient for sending water out to the river via the High Level Storm Sewer. Therefore, the water will remain within the HLSS service area on the surface, further aggravating the flood condition
- b) For the people in this area, it seems Alternative 3 would then potentially create a worse flooding condition for them with the wall in place and an HLSS system that is unable to drain during the event

Is it thus necessary to complete a separation of the sanitary/stormwater collection system in this area to concur with the completion of the wall?

16. 4.2 CULTURAL RESOURCES

As one of the most intact examples of 19th century “maritime village” architecture and urban design in the New York area, we are very proud of the cultural heritage of our community. For over 150 years, we have welcomed generations of immigrants from a succession of different nations and continents. We hope this social and civil tradition of welcome can endure into the future. Within the DEIS, we found Section 4.2 to be a condensed, well-researched, richly illustrated, and fairly accurate distillation of Hoboken’s historic resources. One person pointed out that this section would be a good text for high school students who are seeking to learn about our community. Should NJDEP ever follow up on our numerous suggestions to try and build some lesson plans and perhaps a STEM curriculum out of this project, this report might be a good place to start.

While we are grateful for the effort made, there are a number of steps in the process where greater effort and action needs to be made:

- The individuals & organizations as “consulting parties” for the Section 106 Review need to be identified soon and engaged with as early as possible in this process.
- The Areas of Potential Effects (APE) name a distance of one block plus ninety feet of buffer around a historic or archeological resource. If this circumference differs from what the federal standard is in a Section 106 Review, it would be important to include this dimension as a point of comparison and explain why one was chosen over the other.
- There are many references to archeological resources not within the APE. Curiously absent, though also not within the APE, are mentions of the rarity of the geological serpentine rock formation known as Castle Point, and given that this is a “living” document, with the potential for other applications, more information should be stated about this unique geology, and the Native American archeological repositories within the Stevens Historic District.
- Methods of mitigation for any adverse effects should be stated and outlined.

As with the Vibration and Noise sections, this important content seemed relatively lacking in detail, leaving many members of the CAG concerned whether the DEIS process has been as diligent in these topics as it needs to be. We think mitigation in these sections needs more thought as well as some commitments.

17. 4.4 VIBRATION

According to the DEIS, there are no vibration related regulations at the federal, state or county level to use as a guide, rather a guide for best practices. We hope the project team has sought out local guidance. For example, the Rue Building (3rd and Garden) and the Community Church of Hoboken (6th and Garden) are two historic structures in town who have both had to deal with

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vibration impact from pile driving and construction in recent years.

In addition to the recommended vibration control measures and standard specifications that the DEIS indicates will be implemented as this project moves forward, the CAG believes that these additional measures should be taken:

- Establish a process for communicating with the population surrounding the various construction sites at least 3 times before work commencing in their area. If initial outreach is done six months in advance, subsequent outreach should happen 1 month and then again 1 week before work that might affect the area is to begin. A verifiable record of this outreach should be kept by the Contractor.
- Establish a process for;
 - collecting complaints through an easy to reach office (physical location), as well as clearly identified phone number and email.
 - determining recourse to remedy damage created and administer this process in both a timely and objective manner.
- In addition, we suggest that this process(es) be separated from general city operations/management.

In summation, we feel it is important for the population to know who to reach out to with issues and not just to feel that they have to go yell at the guy in the hard hat on the corner when there is an issue.

18. 4.5 VISUAL AND AESTHETIC RESOURCES

Under the Secretary of the Interior's Standards for the Treatment of Historic Properties, the prevailing ethos was long-thought to be that new construction within historic districts must be of its own time and not mimic the past. This is now believed by some preservation experts to be a misinterpretation dating back to the federal Historic Preservation Act of 1966.

The resist barriers, by their nature, must differ from place to place and their application. Where they are tangent or near to historic properties, every effort must be made to ensure a complementary relationship between these barriers and the extant, historic structures.

The aesthetic treatment of many of these project design elements as shown in the meetings was very diverse. Some looked sculptural, some looked oppressive, thus representing values very different from the diverse welcoming and inclusive society we seek to promote in this country.

While the renderings shown in the DEIS do represent a little imagination, it is not made clear in the DEIS text which direction(s) the team wanted to take the project. Will we aim to be sensitive to the urban landscape elements? Provocative? Respectful? There is a feeling that the renderings of potential resist barriers shown to date, while only conceptual, risk becoming "dated" very soon. They do not seem to be tailored in their conceptual design to the historic fabric of the project area.

As with the Vibration, Noise, and Cultural Resources sections, any guidance on mitigation seems lacking.

- We think mitigation in these sections needs more thought.
- As we move towards a Record of Decision, the State should also offer up some commitments as to how they will try to be careful in the project implementation.

A useful framework might be what New York City uses in their waterfront planning framework, where they focus on about specific “reaches” along the coast. By this line of thinking, the portion of the Resist strategy proposed along Garden between 14th and 15th Street, being between two modern buildings, would be different in look and feel than the resist structure proposed to run through the east-west alley where it abuts historic buildings.

The CAG believes that methods of mitigation for any adverse effects should be stated and outlined.

19. 4.6 AIR QUALITY – Concerns about Over Reliance on County-wide Data, Limited Modelling, Inadequate Number of Sampling Stations, and Lack of Any Commitment to Monitor Air Quality During Construction.

While the conclusion of this report is that projected emissions were in compliance with (NAAQS) National Ambient Air Quality Standards we do have concerns regarding air quality monitoring on a local (Hoboken, Weehawken, Jersey City) as well as regional level, and with monitoring of substances that are not addressed in this report.

We also believe it is irresponsible and unacceptable for no Air Quality monitoring system / protocol to be planned and implemented during the construction phase.

Across the CAG, we all know residents and neighbors who suffer a wide variety of respiratory ailments. One of our biggest concerns apart from the immediate effects of construction vehicle emissions is particulate matter control. We believe the fine particles could negatively impact the public in the project area especially if they already have respiratory problems or if the construction process encounters unexpected subsurface conditions that sends surprise pollutants airborne.

Specific concerns:

- a) Models in the report were based on the very broad geography of Hudson County, rather than the local and very congested areas around the Lincoln Tunnel and Holland Tunnel. There can be very large variations in pollutant concentration in a local urban environment as opposed to the larger scale of Hudson County. Ask the folks who live around either tunnel why they rarely open their windows. The pollution and the soot is a threat to their health. Construction will aggravate these local conditions.

b) While considerable space was devoted to methodology in regards to estimating air pollutant emissions related to construction, including vehicular emissions and emergency generator associated pump stations, there is no mention of practical measures for the actual monitoring and measuring of local ambient air quality

c) Construction related emissions were calculated for pollutants of concern these were designated as (CO, NO_x, VOCs and PM_{2.5}). These are the pollutants that Hudson county has been designated as nonattainment or maintenance of NAAQS (National Ambient Air Quality Standards) However, the report does not address NO₂, Pb, SO₂ and PM10. These are not addressed because Hudson county has been designated as attainment for these substances as relates to NAAQS. Given the fact that generic Hudson County data was used in this study rather than Lincoln Tunnel Toll plaza data, it seems clear that the responsible approach would be to provide more detailed and local information on risks from NO₂, Pb, SO₂ and PM10 so that we can collectively decide whether the allowable limits are being exceeded in the vicinity of and potentially on account of the project.

d) There is specific concern within the CAG about Pb (lead). Knowing that pollutant concentrations can vary widely from a local level to a county level, it is believed that the volume of construction demolition happening in the project area on a daily basis as well as auto emissions may lead to the release of substances (lead) that are not being monitored as they should.

e) PM_{2.5} was addressed as its maintenance under NAAQS standards. The proposed mitigation measures such as wetting dust piles and covering vehicles transporting particles out of Hoboken can help to an extent. However there is the possibility as stated above of substances not being monitored and dust not being sufficiently mitigated. The end result may be a significantly greater risk because the analysis irresponsibly relied on a county-wide data set.

Looking ahead we have the following questions:

- What if any modeling methods are being developed by the current Project Team or the potential next Project Team to work on a local level?
- How do we measure emissions on a local level besides the use of Hudson County Monitoring Stations?
- What information can be provided to the community about the equipment, methodology, and siting of monitoring stations? As the report mentions only the Jersey City Monitoring Station, which monitors particulate matter, it seems by not including and actively seeking to include more local data, such as at the Lincoln Tunnel Toll Plaza, the Draft EIS at this point may drastically understates and underestimates the Air Quality threats to human and environmental health.

- How specifically do we go about attaining and maintaining the (NAAQS) National Ambient Air Quality Standards on a local level should the monitoring measures put in effect indicate that we are not meeting standards?
- Looking ahead towards a Record of Decision, can meetings with environmental specialists including the areas of Air Quality be arranged? Is there funding available for independent analysis should that prove necessary? Can the latest Draft Action Amendment to the Project Agreement be updated to address these concerns?

We believe the Draft EIS at this point drastically understates and underestimates the Air Quality threats to human and environmental health. We request the project team to revisit the analysis based on data in the vicinity of the Lincoln Tunnel Toll Plaza, and commit to modelling and monitoring on specific local and possibly street level (where there will be extensive pile driving for example) scale in order to more accurately assess the effect of our air quality on our community.

20. 4.7 HAZARDOUS MATERIALS

As the DEIS points out, there are a tremendous number of hazardous materials regulations and regulatory bodies that need to be involved or at least informed as the process is moving forward. We assume that NJDEP will take the lead in ensuring that the appropriate entities will follow the requirements as laid out in the DEIS study.

Given the nature of the project area, which consists of large amounts of historic fill (often of unknown origin), it is safe to expect that the vast majority of the land is undoubtedly contaminated to varying degrees.

The number of test wells that have been made to date have been inadequate. It is also surprising to us that no soil sampling has been done, even though we have stated at public meetings that we feel sampling in in this early stage is necessary.

Therefore it is necessary to set aside a large contingency fund to deal with contamination that will be found. When testing begins the problem may well be larger than expected.

As with the Vibrations section above, it seems abundantly clear that this entire process is going to involve large inconveniences for residents, commuters and businesses during construction. Our hope is that the communication with the general public is clear and constant so that there are limited surprises and that people can adequately prepare for the many types of interruptions to their lives that are required in a project of this size.

21. 4.8 Socioeconomics and land use

The summary seemed rather clear and up-to-date, however there were some items that we thought warranted more consideration:

Isn't this the place to discuss more about the potential benefits of Resist/Delay/Store/Discharge?

While our concerns about the seeming misdirection of the Project Engineering team's bias towards Resist is clearly stated above, this section presents another place to emphasize additional benefits of the comprehensive approach we are seeking.

For example:

- Short-term construction-period employment gains.
- Long term operations, maintenance, and management jobs of the resultant infrastructure
- A residential real estate market that becomes increasingly resilient to "panic selling" in the face of rising tide levels and coastal flooding.
- New property-tax revenue that can be unlocked from underdeveloped (or undeveloped) low-lying land once R/D/S/D creates a predictable market for newly dry property that will be bought and sold at its optimal real estate value.

While the document identifies the prospect of lower flood-insurance coverage, it is also important for the State of New Jersey to consider the Hoboken situation in the context of the National Flood Insurance Program's federal reauthorization. This is supposed to happen in September. What is happening now in Hoboken is an important case for the entire nation's NFIP situation. Perhaps we should commission an analysis from an objective Third Party to address this question: if Hoboken requested a waiver from the NFIP program, what could we do with those premiums going forward?

Let's face it, the writing is on the wall that the NFIP will not be reliable in the future. Maybe the smart thing to do is opt out now with the Federal Government's assent and pioneer the movement to create new financial mechanisms as well as comprehensive flood defense strategies.

22. 4.9 TRANSPORTATION AND INFRASTRUCTURE

We live at the edge of the Hudson River, New York harbor, and Atlantic Ocean. Our exposed transportation infrastructure sits on this edge and needs to be hardened and made resilient. Given the fact that some infrastructure can't be moved and in some cases cannot be raised it needs to be protected in place so that it isn't exposed and damaged during high water flood events.

Large portions of the proposed resist structure runs through areas which were the Hudson shoreline has been moved into the river filled in and bulkheads raised. With the final alignment soon to be determined, it is important to gather any and all information in regard to existing conditions below grade as best possible. This information will help minimize contractual variables which will drive unforeseen costs later.

Due to the significant but mostly manageable impacts of construction, education and distribution of information to the public and area stakeholders will be increasingly important. The CAG has commented previously on what we feel have been gross shortcomings in outreach during this evaluation phase. We hope the State and the project team will develop and execute a more meaningful and version of the Outreach Plan than was executed or led during this initial phase.

Our general comments on this section area:

- Once the Resist alignment is determined in the Record of Decision then additional investigation of underground existing conditions needs to be done to minimize potential unforeseen costs and complications during construction.
- Studies of vehicular, goods movement/ delivery, pedestrian, mass transit, Americans with Disabilities Act compliance and circulation need to be more thorough for all areas of potential impact.
- Additional information needs to be included in regard to ingress and egress points to the west of Hoboken and up the Palisades.
- There is surprisingly little information here related to the PATH train. it is heavily used by locals and those commuting through.
- Additional information needs to be included in regard to On street (and Off street) parking in Hoboken (and adjoining Weehawken and Jersey City).
- Additional information in regard to the construction of the High Water Sewer Systems and its construction should be included.

23. 4.9.1 METHODOLOGY

The number of commuters traveling through the Hoboken terminal was severely cut for a long period of time. This had a major impact on the length of commutes and the commuting patterns for many. It took significant periods of time for these systems to be fully resorted. Businesses that depended on the volume or patterns of commuters were badly hurt during this period.

Ferry service at the Hoboken terminal, 14th street and at Lincoln Harbor were damaged in Sandy but they were more easily restored. These locations critically geared up to offer alternate trans-Hudson transportation options to those normally using the PATH or other connections.

There are only 8 roads that ingress and egress the core of the study area. Three to the south (at Marin, Grove and Jersey/Newark), two to our north (Park and Willow) and three to our west up the Palisades (New York/Ravine, Paterson Plank/ Franklin and the 14th st viaduct. It seems an oversight to not have these pointed out in document).

North/south road transit through Hoboken serves as a critical lowland link between the Holland (i-78 & rt 1&9) and Lincoln Tunnels (RT 495) which is most important for emergency and other needs. Access to the Hoboken hospital is critical to adjoining communities. These roads also provide access to the Hoboken Terminal. Port Authority personnel regularly pass through Hoboken between their facilities. North Hudson Fire Department more readily access different parts of their district by way of the 14th street and willow avenue viaducts.

During times of regional emergencies (as seen in 9-11) access by ferry, path or other means to the Hudson waterfront becomes a critical evacuation route for NYC. We need to be mindful that tens of thousands were taken to Hoboken and areas of Weehawken and Jersey City on that day.

Additional mention should be made in regard to bike and pedestrian egress not adjoining our road network. The Hudson River walkway immediately following the sandy high tide was mostly passable. It served as a non-vehicular pathway to get to north or south which was

otherwise prevented by the need to crossing rail alignments or entrapped high water. The elevator at the 9th st (note also Congress st) if it has power, connects the “back of town” to jersey city heights it can be used by pedestrians to scale the palisades.

24. Figure 4.92 Transportation Map.

- Additional information showing ingress/egress points (New York Ave, Paterson Plank road and 14th street viaduct) needs to be included on the map. Ingress/ Egress paths at all locations should be better noted or highlighted perhaps using arrows.
- Notation should be made on ferry routes as to NYC destinations. 14th Street ferry is incorrectly shown at 13th street location.
- Mark the Hudson River Walkway on map along waterway.
- 9th street Light Rail should be marked with Congress St designation and elevator connection.
- The PATH station should be labeled at the Hoboken Terminal.

25. 4.9.2.1.1 Roadway Operations

Study Area Operations

There is a great deal of information bike sharing programs. It appears that additional back up information ought to be included for other transportation systems.

26. 4.9.2.1.7 On Street parking

Additional data on off street parking capacity ought to be included, particularly given the cascading effects that will come as the RBD flood protection system begins to be mobilized before a storm.

Additional parking and vehicle data in Weehawken and Jersey City ought to be included as they share similar transportation and infrastructure issues with adjoining portions of Hoboken.

27. 4.9.2.2 Infrastructure

Sanitary and Storm Sewers

Coordination with the NHSA system is one of the single most critically important aspects of assuring the success of our RBD project. We no longer have creeks which drain Hoboken into the Hudson, and proposals to create surface water and detention storage areas/facilities introduce water management features that we don't presently have the need to operate and maintain. Nevertheless, we believe such a “building with nature” approach, even hybridized with pumps, is worth taking the initiative.

It has been calculated that approximately 460,000,000 gallons of surge water flowed into Hoboken and the adjoining study area and was entrapped during and after Superstorm Sandy. This surge overwhelmed many systems. During normal operations the NHSA can fully process approximately 20MGD. Plant capacity is closer to 35MGD.

Since the storm, a new + 80MGD pump station at Maxwell Place has been installed, relieving some pressure on the volume of water any Resist strategy may need to handle.

- The addition of High Level Storm Sewer (HLSS) systems “outboard” of the resist structure in the Hoboken area adjoining the Shipyard and southeast Hoboken by the main post office will present logistical and construction challenges with excavation and work in areas that have heavy vehicular, pedestrian and commercial use.
- The addition of High Level Storm Sewer (HLSS) adjoining the new southwest park will present coordination and logistical issues particularly in regard to road traffic. Second to the Lincoln Tunnel, this area is probably the most congested road network in the project area.
- The addition of High Level Storm Sewer (HLSS) will present unique construction safety coordination issues at the active Hudson Bergen Light Rail and at the adjoining Hoboken Housing Authority area and the residents in the area.
- The addition of a High Water Sewer System at Northwest Hoboken and the BASF site will become continually more difficult as this area of town is developed and with the addition of through traffic. This should be incorporated into the phasing strategy

We have heard that in other places around the State (e.g., Linden River) some rail and transportation infrastructure owners/operators have proved unwilling to accommodate new openings or culverts beneath their infrastructure. We hope this has been addressed already with those stakeholders.

28. Figure 4.104 Sanitary and Storm Sewer Map

Perhaps better information is offered elsewhere but this map as shown is confusing and does not adequately show the direction of sewerage flow in forced mains and trunk lines.

A full-size document showing the study area with all existing and proposed sewer lines needs to be generated in and coordinated with the NHSA.

It should be clarified what impacts, if any, there might be in the portion of Jersey City north of the flood barriers which may drain into the jersey city sewer system not the NHSA.

Water

Suez is beginning to replace and upgrading the main trunk line on Washington Street. It has been speculated that one of the residual impacts of Superstorm Sandy is that the soil supporting the underground water lines was compromised, thus accelerating the number of water breaks we have.

As the RBD project moves forward, will utility companies be required to pay for the cost of relocating their infrastructure?

Electric and Gas

The information given in the document is unclear. It states there are “major lines” in certain locations but fails to point out if these are electric or gas lines.

The location of each of the PSE&G electrical substations should be noted and shown. They all suffered extensive flood damage. These are not shown on the critical infrastructure maps. They are located at:

- Second and Harrison
- Madison and 12th
- Clinton and 16th
- Jersey Ave @ NJT train row (in nearby Jersey City)

The elevation and flood exposure of each of these substations is critical as they provide the vast majority of the electrical power in the study area. The loss of power impacted everyone not just those in areas which were flooded. The loss of power hindered pumping out, emergency services and all facets of our flood and recovery.

Thousands of gas meters needed to be replaced post storm. They were compromised by their exposure to salt water.

Where do we presently have vulnerability exposure in our gas supply system?

Telecommunications

The documents should include a marked up map showing the telecommunication trunk lines and substations. Note: our underground telecommunications have been primarily installed in areas which have more recently been developed in formerly industrial non-residential areas. Historic residential areas in the “core” of Hoboken are largely served by overhead wires.

What and where are our Fiber Optic and Cable TV vulnerability?

What and where is our copper phone line exposure?

While industry has focused on upgrading their customer’s preferences to digital technology, we believe there is still great value in maintaining a copper wire system because communications transmissions can be made even when electricity is down. In addition, those households who are still on copper wire may also be more vulnerable to the many impacts of extended power outages and disruptive events.

29. 4.9.3.1 Impacts on Transportation.

Short Term Construction Impacts.

It should be stressed that the long term benefits in the form of flood protection, improved infrastructure, resiliency and public amenities will benefit us long after short term impacts have passed. Therefore we know and accept we will need to make some short term sacrifices in order to protect ourselves from future events.

That said, work still will need to be well planned out and timed to as to optimize work and minimize impacts. Off hours construction as well as sound dampening and noise mitigation strategies will need to be employed. Construction at different locations needs to be coordinated to minimize the combined impact of simultaneous work.

It will be most important to develop a critical path of construction which minimizes impacts while allowing for the unknowns.

As noted in the Vibration section above, the education, distribution and coordination of timely information for the public, businesses, institutions and other parties are most important. Direct contact via project office, phone, email and website as well as a centralized point or bulletin board showing public information would be most helpful.

30. Questions regarding NJ Transit Yard Alignment

Has NJT expressed willingness to sacrifice for the long term one Track to allow for the installation of the resist structure within their property? This could also enable a number of tracks and facilities within the rail yard to be protected in event of a storm.

Has the team explored the possibility of moving some volume of construction traffic throughout Hoboken and adjacent areas by rail? Perhaps there is the possibility to move construction materials, supplies and waste material off of our streets and onto the rails, particularly during off peak hours

31. Need for Coordination During Planning, Design, Construction, and Operation of a Flood Defense System Mobilized for a Storm

- A map showing emergency routes when the storm barriers are partially or fully deployed should be included in the Draft EIS document.
- A comprehensive plan of emergency action when the flood gates are in place needs to be developed and presented to the public review. Emergency means of access to areas outside/ beyond the flood barriers need to be reviewed. Parking and other logistical issues need to be understood. Connections to the Hoboken Terminal, Lincoln and Holland Tunnels, and 14th Street viaduct/ roadway/ ferry terminal are of particular importance in emergencies, considering their regional importance.
- A thoughtful emergency sequencing strategy for the deployment of barriers needs to be developed that would maintain the use of high volume 14th street and one of the southern egress point probably jersey ave would allow for longer continued connections.

- Additional marine and/or amphibious assets – e.g., vehicles/ vessels for emergency response - should be considered and coordinated with installation of our flood protection as part of the potential needs which our community may face for the area beyond the barrier.
- Police, fire and emergency service within Hoboken, Weehawken and Jersey City will need to be coordinated with and through the construction process. This list should also include NJ Transit police, Port Authority (PATH and police), Hudson County, Hudson Bergen Light Rail, PSE&G, NHSA, Verizon, private property owners, business owners, residents and others. A comprehensive contact list should be maintained and made available to the CAG and interested parties.

32. Appendix B

The State of New Jersey through the N.J. Historic Preservation Office is seeking to create an expanded Hoboken Historic District that will increase historic-district protections in the project area. We feel that expanding the district will not negatively affect Resist, Delay, Store, Discharge (RDSD). To the contrary, increasing property owners' sensitivity to and stewardship of Hoboken's historic residential, commercial and industrial properties will support and enhance the underlying characteristics of Hoboken's largely-intact 19th-century and early 20th-century housing stock – a resource that has continually attracted residents and new investment since the 1970s. To the extent that RDSD seeks to continue to protect real estate values, and the corollary benefits that accrue from property tax revenue, historic district expansion will complement all aspects of RDSD.

Administration of the Municipal Land Use Law through zoning, planning and historic preservation regulation must complement, not work against, the optimization of real estate values. Any prolonged implementation of flood-risk reduction regulations that is perceived to be arbitrary and capricious risks driving away residential real estate purchasers and investors. Even the perception will dilute our beloved community's "brand." A municipality with a weakened real estate market will find it increasingly challenging to fund and finance infrastructure improvements for the protection of residents who remain.

33. Appendix C:

In reviewing the Appendix C memo of the Hydrology Report it seems remarkably brief given the technical complexity of the whole model. As we have learned from DEP that the Feasibility Study has been informed by the firms/ institutes including Moffatt & Nichols, Louis Berger, Stevens Institute of Technology (Steven's) and Dewberry, we feel that the credibility of this document would be greatly informed by adding more of the content of the meetings in which these parties participated.

34. Integrity of the Public Comment Period and Process

We are aware that member(s) of our community have expressed their concern that the selection of Alternative 3 or the paradigm of the Environmental Assessment may be premature. We understand this to stem from the fact that the City of Hoboken is now requesting and may receive HUD funds for remedial actions related to contaminated properties which it has or is contemplating for purchase for retention facilities. On one hand, we are not sure whether these acts by the City would result in the need to the reset the public comment period or create a separate public process, or amendments to Action Plans. It is important for us to acknowledge that CAG actually requested that the Scope of the DEIS include such potential new facilities as the CSO detention tank (Letter from Hoboken CAG to NJDEP 7 October 2015, page 2, para. 2).

However, we also feel strongly that the public aspects of this process are equally important to the technical aspects of the process. Therefore we ask NJDEP to issue a clear and objective determination as to whether these actions or intended actions by the City require that the public process to be extended or reopened.

Closing

In closing, we are grateful for the State and especially our Mayor's efforts to keep this project on track and moving forward. As we look ahead, we want to move towards a Record of Decision and final design that will make investments at the water's edge in the V- or wave impact zone, but also make investments in smaller urban water management projects around the city such as at schools, parks, gardens, public buildings, public rights-of-way and other community facilities. Below are some points we ask the State to consider as you prepare for the next phase of design:

1. Adhere to the original vision - Put us on an implementation path that adheres to the original vision for the Rebuild By Design. It was because of this initial integrated, comprehensive vision that we were awarded the funds. This fact is public knowledge. Therefore the project moving forward should adhere to and advance this comprehensive strategy rather than presuming that other projects or mechanisms will deliver those benefits.

2. Invest in Social Resilience - One initiative we point out that is happening in New York is the allocation of \$2M in RBD CDBG funds to educational and research projects undertaken by local groups, ranging from research institutions to NGOs. The State of New York calls them investments in "social resilience." We think this is a great program that we should try to develop here as well. In fact, in our CAG Comments on October 7, 2015 we specifically asked to include near-term projects and at various scales (page 3, paragraph 2).

Apart from the large infrastructures, such as those proposed in Resist element, we believe these smaller local projects are the types of places where this story of flood and climate change risk needs to be told. Every green infrastructure installation can become a small outdoor lab to help educate our residents and particularly our young people.

Without any new programs or elements within the RBD Hudson River project that engage everyday people, we will fail as a community to build the social capacity we will need to fund,

operate and maintain this overall system. Therefore we believe that local projects, even small projects undertaken by local community groups or educational organizations, will enable more people to understand that though they may live far from the river, they still live dangerously close to sea level. These smaller local projects can help reduce local flooding from precipitation risk as well as create valuable co-benefits of cleaner air, a greener city, and less summer heat.

3. Design an Adaptable Foundation for Phase 1 - as we look ahead to a Record of Decision we need to look at an implementation strategy that will allow us to implement flood risk reduction measures in smaller increments. We need an adaptable strategy, one we can build on in the future. We think this means a strong physical foundation, with a top layer of protection that can be later installed, replaced or raised as needs, funds, and other conditions allow. This foundation should also be designed to consider what is possible and allowable in wave impact zones versus areas where wave energy is not significant.

4. Answer the Question: What IS Our Tolerance for Flooding in the project area?

As noted in our comments above, since the flood of 2012, our daily stormwater pump capacity has increased significantly. The whole challenge we are trying to address needs to be restated again in the Record of Decision: rather than seek to “minimize”, we instead seek to “reduce and responsibly manage.” As stated above, knowing full well we don’t want to be inundated with 470 million gallons of river and sea water, what is our tolerance for getting wet?

Looking at it from the facilities perspective, how much flood water can be let in before the Hospital cannot function? Before the fire stations have to be evacuated? Before our local evacuation shelter must be evacuated? Before our Ambulance HQ has to close?

Looking at it from the systems perspective, how much flood water can be allowed in before our Ambulances and fire trucks cannot navigate the streets? Before our substations are inundated causing widespread outages? Whatever the number is, it is most certainly something between 470 MG (the estimated Sandy surge volume) and 130 MG (our understanding of the local pump capacity, per day). We believe this is the line of thinking that should determine the extent of the Resist structure.

5. Provide Independent Technical Support, and More Active and Inclusive Communications and Engagement Strategies

The technical complexity of this process has shown us that we would have been better served by having dedicated and independent Technical Support for the CAG. While we do have some capacity amongst ourselves, the reality is we have not been able to muster a truly comprehensive response to the DEIS at this critical time. We have not been able to review the huge volume of information and technical data as thoroughly as we hoped and needed to have done. While the Mayors of the cities and town in the project have lent staff support, for which we are grateful, the reality is that a project of this scale, complexity, and involving this amount of money really demands that dedicated and independent support to the community, perhaps through the CAG, is needed. Many Departments of Transportation projects do provide Technical Support for the community. We should follow that example.

HUD has told us this would be an eligible expense under the RBD program and we hereby ask the State to provide this for us in the next stage.

Also, the public process so far has struggled to engage the diversity of Hoboken. The vast majority of speakers at meetings did not represent the diversity within the project area. The Citizen Outreach Plan ended up being a list that no one working on the project really took ownership of. There were many useful ideas there that were not implemented or actively initiated.

Looking ahead to the next phase, to fulfill the Rebuild By Design vision of an inclusive process, one that serves society as a whole, we really need to open up the tent a little wider, get out into the community more, and into the classrooms. What we design and build over the next 5-7 years our young people will have to live with and soon pay for. More effective outreach will be good not just for this project - but for our country's Democracy as well.

All in all we are proud to play a supporting role in this process. We want and expect our values and our goals to be the goals of the project and of your consultant teams, now and in the future.

We are grateful for your Agency's leadership and support and we look forward to working collaboratively into the future.

Thank you.

Hon. Ravi Bhalla

Carter Craft

LaTrenda Ross

CAG Co-Chairs