FiDi FORGE
EIS Scoping Report

FiDi and Seaport
Fortifying Our Resilient Growth & Economy

New York City, New York County (Manhattan), New York
October 2026

Provided by:
U.S. Army Corps of Engineers
New York City Economic Development Corporation

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This document provides the information presented as part of the public scoping process conducted by the United States Army Corps of Engineers (USACE), the comments received during the scoping period, and responses to those comments in association with the Section 203 study and Environmental Impact Statement (EIS) for the Financial District and Seaport Fortifying Our Resilient Growth & Economy (FiDi FORGE) Coastal Storm Risk Management Section 203 Study for New York, New York. The Section 203 study and EIS will be prepared as an Integrated Interim Feasibility Study and Environmental Impact Statement (Integrated Interim Report).

The USACE solicited public participation and input on the scope of the study and EIS, including information provided in the Public Notice and Additional Information Document. The public was invited to submit comments related to the scope and preparation of the Draft Integrated Interim Report during the scoping period from May 28, 2026 through July 23, 2026.

1. Introduction and Background

1.1 Study Description

The USACE and the New York City Economic Development Corporation (NYCEDC), acting as a non-federal interest on behalf of the City of New York, are partnering to investigate the feasibility of managing coastal storm risk in Lower Manhattan within the Financial District and South Street Seaport and surrounding areas. The study will evaluate coastal storm risk management measures for approximately 0.9 miles of the Lower Manhattan and East River waterfront from the Brooklyn Bridge to The Battery (**Figure 1**). Due to its low-lying topography and location along the East River, the area is at greater risk due to high tidal elevations and coastal flooding from the increasing severity in storm events.

1.2 Previous Planning Studies

FiDi FORGE was first considered within a larger planning effort collectively known as “The Big U,” which was led by NYCEDC and the Mayor’s Office of Climate and Environmental Justice (previously known as the Mayor’s Office of Recovery and Resiliency). Following the 2014 release of the “The Big U” proposal, the Mayor’s Office of Recovery and Resiliency and NYCEDC led the Lower Manhattan Climate Resiliency Study. With the release of the Lower Manhattan Climate Resiliency Study in 2019, the City of New York adopted a phased approach to implementing solutions in multiple geographic areas. As such, the planning effort was subsequently separated into four projects, and the Financial District and South Street Seaport area became the subject of its own study through the Financial District and Seaport Climate Resilience Plan. The master planning process for the Financial District and Seaport Climate Resilience Plan, which was completed in 2021, included robust public engagement; city, state, and federal agency coordination; technical analysis; recommendations for coastal storm risk management designs and alternatives; and an implementation plan.

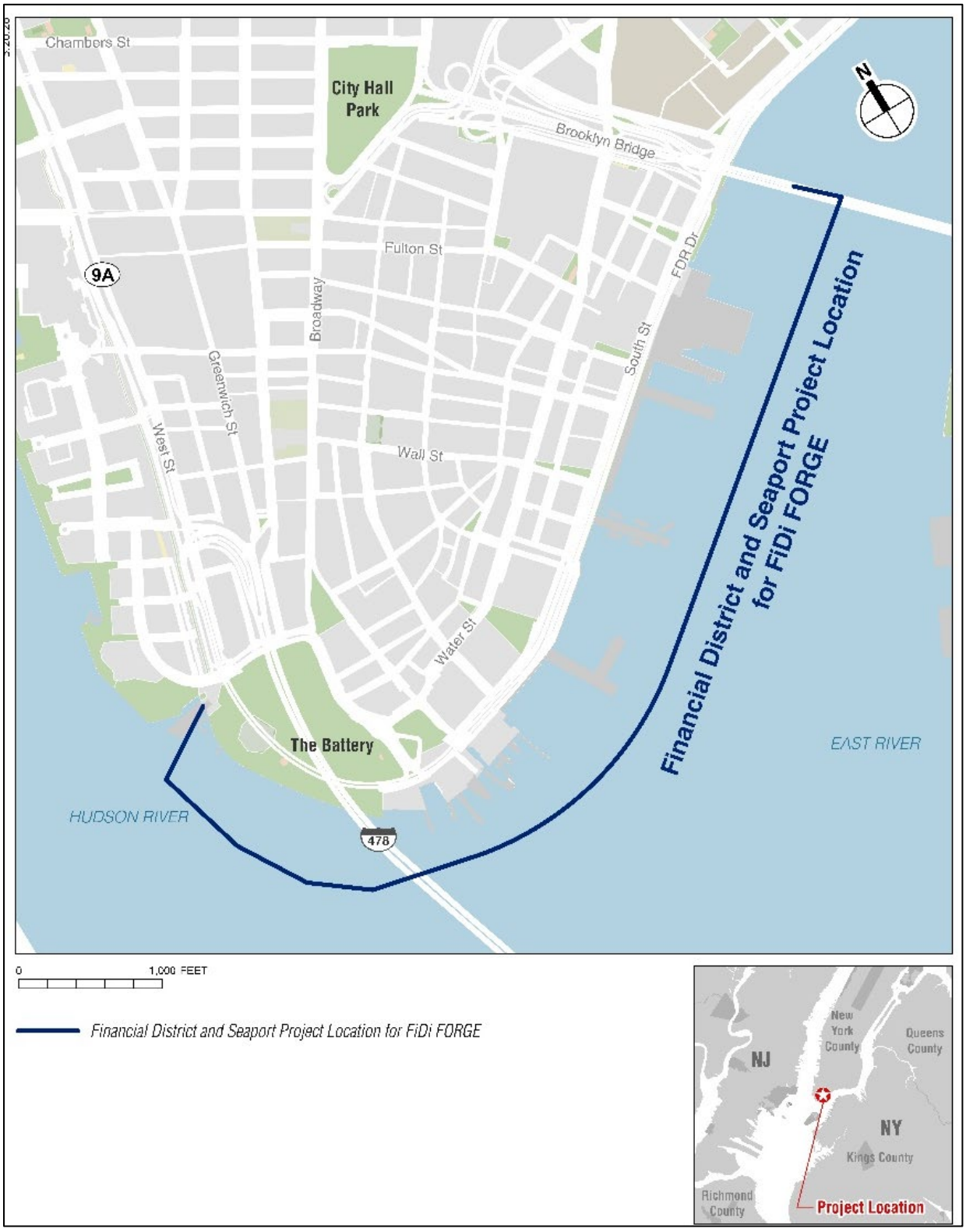


Figure 1. FiDi FORGE Location

As part of the master planning effort, the USACE chaired a committee of local, state, and federal agencies associated with regulatory review, coordination, and permitting roles for managing and regulating aquatic and coastal resources to collaborate throughout the planning effort. This collaborative working group, known as the Aquatic Resources Advisory Committee, began meeting in 2020 and continued throughout the course of the planning process.

USACE also coordinated with the City of New York on the New York and New Jersey Harbor and Tributaries Study and released a coastal storm risk management feasibility study, Draft Integrated Feasibility Report, and Tier 1 Environmental Impact Statement in 2022, followed by a draft report for early actionable elements of the study in 2025. The FiDi FORGE study area is included in the New York and New Jersey Harbor and Tributaries Study but was not identified as an early actionable element. In 2023, the City of New York and USACE engaged in a workshop exploring alternative delivery mechanisms to advance projects, including FiDi FORGE. Those discussions led to NYCEDC initiating the current FiDi FORGE Coastal Storm Risk Management Section 203 Study.

1.3 Study Area and Limits of Disturbance/Sub Areas

The study area limits encompass approximately 0.9 miles of Lower Manhattan and East River waterfront from just south of the Brooklyn Bridge to The Battery. It includes portions of the East River from the Brooklyn Bridge to The Battery and, from north to south, Piers 17, 16, 15, and 11 (servicing the NYC Ferry); the Downtown Skyport at Pier 6; the Battery Maritime Building (servicing Governors Island Ferry); Whitehall Ferry Terminal (servicing Staten Island Ferry); the United States Coast Guard site; and portions of The Battery.

This area includes several neighborhoods with varying characteristics. Lower Manhattan is a place where people work and live, with 24-hour services and amenities; open spaces; and recreational uses for residents, students, and employees. It includes a residential community and is a business district and transportation hub. Based on the previous Financial District and Seaport Climate Resilience Master Plan developed for the study area, Lower Manhattan serves about 510,000 commuters, 290,000 workers, and 62,000 residents including students enrolled in 21 schools and education centers; Lower Manhattan is also a tourist destination, with about 17.7 million annual visitors.[1]

The study area, comprising the South Street Seaport and the eastern portion of the Financial District, had a residential population of 11,211 according to 2020 U.S. Census. For the census tracts that cover the study area, the New York State Department of Labor Quarterly Census of Employment and Wages data recorded approximately 118,700 jobs in 2024. Similarly, the 2023 U.S. Census Bureau's Longitudinal Employer-Household Dynamics noted 98.9% of workers employed in the study area commute from outside the study area census tracts. Of the study area census tract's employed residents, about 8.9% both live and work within the area, while 91.1% commute elsewhere for employment.

The South Street Seaport District has low-lying buildings with historic resources and tourist amenities such as restaurants and shopping, entertainment venues, the South Street Seaport Museum, and other historic landmarks. The Financial District includes large and medium-sized buildings, access to the Downtown Skyport (located on Pier 6), the Wall Street and Pier 11 Ferry Terminal, the Battery Maritime Building, and

[1] Financial District and Seaport Climate Resilience Master Plan. December 2021.

the Franklin D. Roosevelt East River Drive (FDR Drive), elevations of which transition from at-grade to viaduct in this area. Along the East River waterfront is a continuous esplanade with a walkway and bikeway, passive recreational space, and views of the river and the Brooklyn skyline.

The study area is divided into four subareas that will be evaluated based on their unique characteristics and assets (**Figure 2**). These subareas provide a neighborhood-scale approach to communicate risks, impacts, and alternatives. Subareas include the following:

Subarea A: Inclusive of The Battery and the southern tie-in to the adjacent Battery Park City flood protection projects (two southern tie-in options are currently considered: one that connects to the adjacent South Battery Park City Coastal Resilience Project (SBPCR) and one that connects to high ground at Bowling Green). Encompasses Whitehall Ferry Terminal, providing Staten Island Ferry service, and the National Historic Landmark Battery Maritime Building, providing Governors Island Ferry service. It also includes a United States Coast Guard site and significant underground infrastructure: Battery Park vehicular underpass; 1, R/W, and 4/5 subway stations; 1 subway turnaround; and 4/5 and R subway tunnels.

Subarea B: Characterized by the FDR Drive transition from an at-grade boulevard to a viaduct. Includes the East River Esplanade, Pier 11 Wall Street slips, offering NYC Ferry service, the Downtown Skyport, and the 2/3 subway tunnels underground.

Subarea C: Characterized by the National Historic South Street Seaport District, including the Tin Building. Infrastructure includes the A/C subway tunnels underground; the continuation of the FDR Drive viaduct; and Piers 15, 16, and 17, which serve recreational, commercial, and boating uses. The East River Esplanade also traverses this subarea.

Subarea D: Includes the section of waterfront around the National Historic Landmark Brooklyn Bridge, the continuation of the FDR Drive viaduct, and the northern tie-in to the adjacent Brooklyn Bridge-Montgomery Coastal Resilience project. The East River Esplanade also traverses this subarea.

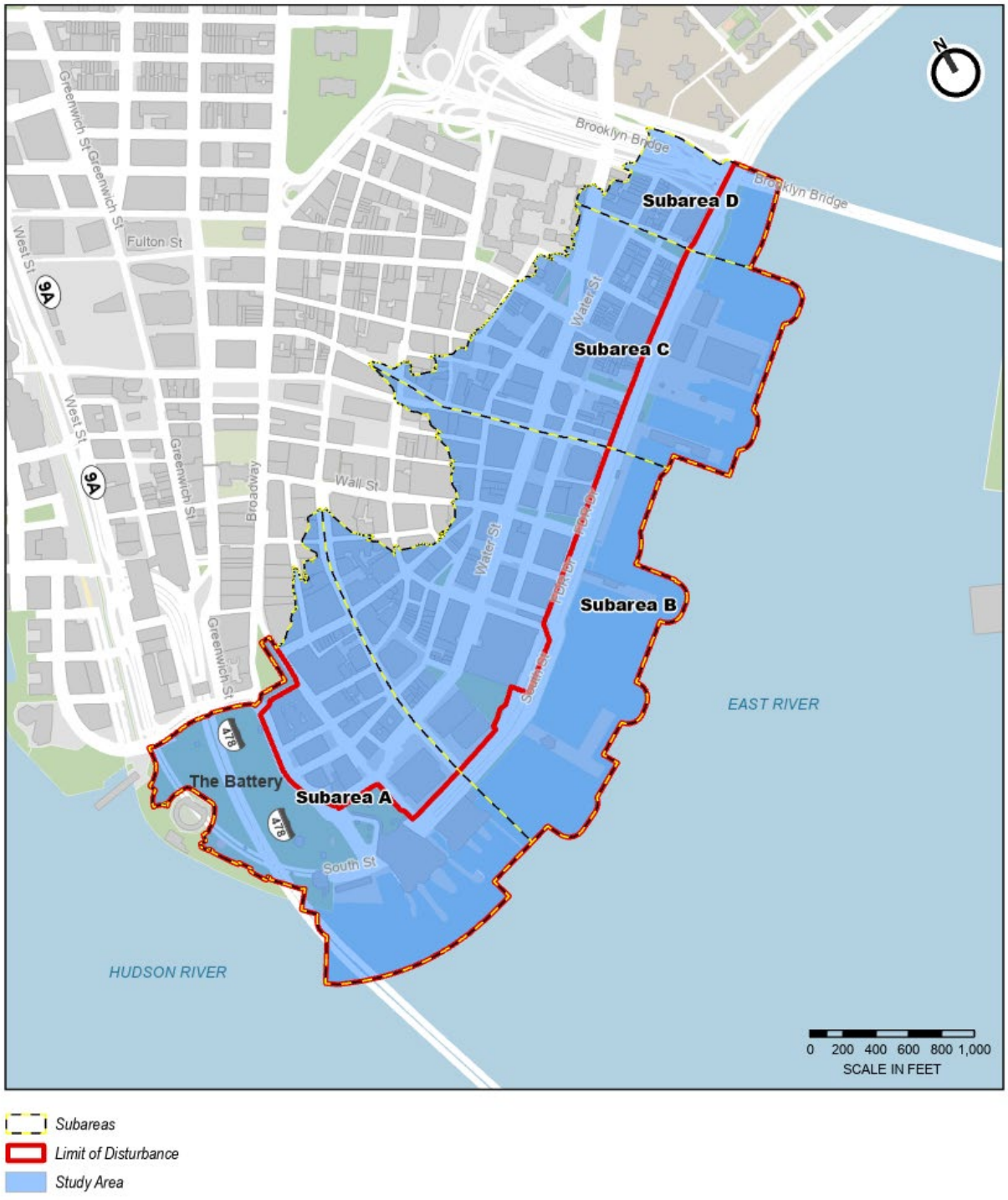


Figure 2. Study Area and Subarea Map

1.4 Area of Investigation

The Integrated Interim Report will consider the areas in which a coastal storm risk management project may have direct or indirect effects during construction or after completion.

1.4.1 Limits of Disturbance

Figure 2 illustrates the limits of disturbance for in-water and above-ground elements that would occur for the range of alternatives considered in the Integrated Interim Report. Proposed elements considered in the alternatives include, but are not limited to, floodwalls, berms, bridge and tunnel crossings, and sea walls.

1.4.2 Direct Study Area

The study area for this analysis is the geographic area where direct impacts from a proposed federal action would occur within the Limits of Disturbance (**Figure 2**). These are the immediate, primary effects of the proposed activities and typically include the physical, ecological, or social effects that may result directly from construction, operation, or implementation.

The Limits of Disturbance consider the range of alternatives proposed for coastal storm risk management. Upland and in-water activities are proposed within this area and are described by subarea. Direct impacts are anticipated to include physical disturbance that would occur within Limits of Disturbance, including the demolition and relocation of existing buildings and other structures, construction of piers, installation of coastal storm risk management measures, modifications to the shoreline, and development of shoreline amenities.

Because FiDi FORGE will be designed to manage the coastal storm risk inland from the Limits of Disturbance, these areas will also be considered part of the direct study area (**Figure 2**). That additional area where coastal storm risk would be managed as a result of the proposed measures was determined using the 100-year floodplain with the New York City Panel on Climate Change's 90th percentile sea level change projection for 2100.[2]

The direct study area will also include the anticipated construction staging areas within the Limits of Disturbance, which will be located under portions of FDR Drive, on barges moored in the East River, and on any newly constructed fill as necessary.

1.4.3 Indirect Study Area

For analysis purposes, indirect effects are those caused by the proposed activities and occur later in time or farther in distance but are still reasonably foreseeable. These are considered alongside direct effects. For FiDi FORGE, proposed activities are anticipated to change the way storm events and coastal flooding affect the direct study area and additional areas along the southern Manhattan coastline and the surrounding water bodies. For that reason, the indirect study area for aquatic resources includes portions

[2] Horton, R., C. Little, V. Gornitz, D. Bader, and M. Oppenheimer. 2015. New York City Panel on Climate Change 2015 Report Chapter 2: Sea Level Rise and Coastal Storms. Ann. N.Y. Acad. Sci., 1336: 36-44. Available online at: https://doi.org/10.1111/nyas.12593

of the lower East River, Upper New York Bay, and Lower Hudson River that will be evaluated through hydrodynamic and water quality modeling. Other resource categories may consider this indirect study area or create other resource-specific areas for evaluation, which would be disclosed in their respective resource analysis documentation.[3]

1.4.4 Projects Included in All Alternatives

All alternatives to be evaluated in the Integrated Interim Report will assume construction of projects already implemented or approved within and adjacent to the study area. This includes The Battery Coastal Resilience Project, which will provide passive flood protection through the reconstruction and elevation of the wharf promenade in The Battery.

The alternatives evaluated will tie into adjacent coastal storm risk management projects, such as the Brooklyn Bridge-Montgomery Coastal Resilience Project to the north of Subarea D and the South Battery Park City Resiliency Project to the northwest of Subarea A.

Not included as a project in the Integrated Interim Report is the Seaport Coastal Resilience project. FiDi FORGE is the larger, comprehensive plan for reducing coastal storm risk in Lower Manhattan's Financial District and Seaport neighborhoods, while the Seaport Coastal Resilience Project (SPCR) as currently proposed is a separate near-term project focused specifically on the Seaport area between John Street and the Brooklyn Bridge, designed to raise the waterfront in this area to 11 feet elevation to address current and future tidal flooding in one of the lowest-lying portions of Lower Manhattan. FiDi FORGE has a longer time horizon for completion, while the Seaport Coastal Resilience Plan is planned for providing more immediate protection of the neighborhood's most vulnerable areas. Following USACE policy, Seaport Coastal Resilience will not be included in the Integrated Interim Report, because the project has not received approval at this time.

[3] For example, an Area of Potential Effects will be delineated as the area of study for the cultural resources evaluation, which may differ from the direct study area identified on Figure 2.

2. Purpose and Need

FiDi FORGE is one of several efforts underway for Lower Manhattan to manage coastal storm risk while maintaining and improving waterfront access to the community. The study area is at risk of coastal flooding from water during coastal storms, extreme tides, and future sea level change. Coastal flooding along the waterfront could cause extensive damage to public infrastructure and private property, loss of life and deterioration of public health and safety, degradation of the natural environment, and adverse changes to the social and economic character of the waterfront community.[4]

Lower Manhattan is a low-lying area with many transportation and economic assets including ferries and associated terminals, residential and commercial buildings, subway stations and tunnels. The study area includes more than 200 buildings with more than an estimated 85,000 jobs, 6,200 residents, and more than $115 million in daily economic output. These assets are relied upon not only by the neighborhoods in the study area, but also by the City of New York, region, and in some cases, the Nation.

Also at risk is Lower Manhattan's utilities, roadways, and subway infrastructure. Highways, roads, railroads, subway tunnels, as well as airports have flooded in New York City during storm events. The loss of transportation function can be system-wide and affects more than the area in which the event occurred, due to the abundant number of maritime, bus, and subways services running throughout the study area. These outages can leave transportation users stranded throughout the system.

While protecting these assets from current and future coastal flood risk, proposed activities need to provide coastal storm risk management while preserving and enhancing transportation operations to and from the study area and within the East River. This includes providing evacuation opportunities and emergency access for the safety of the area's residents and workers. When coastal flooding and extreme weather events are forecasted, evacuations are recommended to minimize the loss of life and injuries. Maritime transportation, particularly, in this area is critically important for supporting emergency services and evacuations, playing a crucial role in emergencies in New York such as the nor'easter storm of December 1992, the terrorist attacks of September 11, 2001, the crash of U.S. Airways Flight 1549 in the Hudson River in January 2009, and following Hurricane Sandy in 2012.

The area needs coastal storm risk management measures. The purpose of the proposed activities is to manage current and future coastal flood risk and sea level changes within the study area by creating a coastal storm risk management system integrated within the neighborhoods that preserves and enhances critical maritime, roadway, and public transit transportation services; residential and business assets; emergency access; and waterfront access for all users.

[4] For comparison, Superstorm Sandy resulted in an estimated $19 billion in damages and lost economic activity across the New York City in 2012.

3. Goals and Objectives

The goal of the study is to manage tidal and coastal flood risk in the FiDi FORGE study area while providing local and regional transportation connectivity and public access to this historically significant waterfront. This goal informed the development of study objectives and evaluation of alternative plans.

The study objectives will be used to identify reasonable alternatives that could meet the purpose and need, as set forth above. These objectives were developed through frequent coordination with multiple stakeholders and the public during the previous master planning process and have been updated based on agency coordination and public feedback received during the EIS Scoping Period. The objectives target the current characteristics that must be maintained or enhanced while constructing and operating coastal storm risk management systems in an urban environment, in limited space, that minimize disruption to transportation services and economic and residential centers of the study area. The revised objectives for FiDi FORGE are as follows:

1. **Objective 1:** Over the 50-year period of analysis, manage the risk of coastal storm and flooding impacts to communities, public infrastructure (including financial, maritime, roadway, and other transportation assets), important societal resources, and the environment.
    a. **Metric:** Quantitative analysis of the assets protected.
2. **Objective 2:** Improve the community's ability to recover from damages caused by coastal storms and floods and maintain ongoing functionality and reliability of surface and subsurface transportation systems by reducing the duration of interruption in services provided by man-made and natural systems.
    a. **Metric:** Qualitative analysis of how a project would reduce service restoration time for structures in the study area.
3. **Objective 3:** Enhance resilience of critical infrastructure and manage risk to human life, health, and safety from coastal storm and flooding impact by ensuring vehicular, pedestrian, emergency/evacuation services are maintained and follow Federal ADA standards.
    a. **Metric:** qualitative analysis of how a project would manage the risk of flooding and promote life safety in residential areas by ensuring access routes and emergency / evacuation services are maintained.
4. **Objective 4: Manage coastal storm and flooding risks to improve community resilience and connectedness for socially vulnerable populations.**
    a. **Metric:** qualitative analysis of how a project would manage the risk of flooding in socially vulnerable communities and protect social networks and community connectedness by ensuring open space remains functional and accessible.

4. Plan Formulation Process

4.1 Project Definition

USACE planning policy and the NEPA of 1969 as amended require that a report be available for public review that describes the analysis, risks, assumptions, and decisions made during this project's planning process. Pursuant to this requirement, the Plan Formulation section of the Draft Integrated Interim Report will:

1. Summarize the problems, opportunities, objectives, and constraints for coastal storm risk management in the FiDi FORGE study area.
2. Present and discuss the results of the plan formulation process.
3. Identify specific details of a Tentatively Selected Plan (Preferred Alternative), including inherent risks.
4. Assist in determining the extent of federal interest and local support for the plan.

The plan formulation process documents the purpose and need, planning objectives, constraints, problems, and opportunities, which in turn inform the development of a range of alternatives for further evaluation. In addition to the purpose and need and objectives outlined above, the following problems, opportunities, and constraints were identified for the study area.

Problems

1. Flood risk from coastal storms and extreme high tides are impacting nationally important areas/facilities, critical infrastructure, economic activity, societal resources, communities, and the environment along the Financial District and South Street Seaport waterfront.
2. Without federal action and financial assistance, it is expected that future relative sea level change will increase the frequency, extent, and depth of tidal flooding along the shoreline, thereby increasing economic damages and coastal storm risk to Lower Manhattan's vibrant waterfront.
3. The waterfront is currently at risk of coastal overtopping and damages to property and critical infrastructure because of coastal storms, including the contribution of tidal and storm surge levels, waves, and wave runup.
4. Changing sea levels will impact the functioning of the combined sewer system and impede the ability of overland stormwater to drain to New York Harbor. These hazards will impact critical utility service and cause flooding for a broad segment of residents and businesses.
5. Changing sea levels and coastal storms will inundate maritime facilities and visitor-serving attractions including the Battery Maritime Building, South Street Seaport Historic District, and other sites with historical significance. Many are listed on the National Register of Historic Places and are more vulnerable to damage due to their age.
6. Access to critical infrastructure, emergency services, and evacuation routes is expected to be limited or cut off entirely during coastal floods, posing a severe risk to life safety.

Opportunities

1. Develop innovative strategies for adapting vulnerable historic maritime resources to relative sea level change consistent with the Secretary of the Interior Standards for Treatment of Historic Properties.
2. Recognize the cultural experiences and traditions of diverse waterfront communities and incorporate them into the planning and design of alternatives.
3. Incorporate green infrastructure for CSRM-related interior drainage, such as bioretention, storage, and permeable pavers.
4. Promote and enhance public access to the Financial District and South Street Seaport waterfront.
5. Minimize carbon emissions from construction.
6. Promote biodiversity and incorporate nature-based solutions.
7. Integrate coastal storm risk management measures with existing Lower Manhattan Coastal Resilience Projects.

Constraints

1. Maintain universal pedestrian access to and from waterfront.
2. Maintain emergency vehicular access to and from waterfront.
3. Maintain waterborne transportation along the waterfront.
4. Minimize impacts to access for federal navigation channels.
5. Minimize impacts to community access and egress during emergencies.
6. Minimize aesthetic impacts to the study area and its resources including neighborhood character and viewsheds.
7. Minimize induced flooding in areas not currently vulnerable to flooding and minimize induced additional flooding in flood-prone areas.
8. Minimize adverse effects to plants, animals, or critical habitat of species that are listed under the federal Endangered Species Act or a New York State Endangered Species Act and to cultural resources.

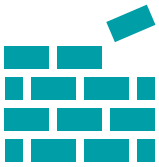
4.2 Range of Alternatives

4.2.1 Initial Approaches

To arrive at the final array of alternatives, NYCEDC formulated five initial thematic approaches that considered a range of strategies to address purpose and need, goals and objectives, problems and opportunities, and constraints. As approaches were developed, NYCEDC considered the waterfront features that are necessary for the continued operations of the urban waterfront within the FiDi FORGE study area, including those associated with critical maritime, roadway, and public transit transportation services; emergency access; and waterfront access for all users.

Measures Considered in Initial Thematic Approaches:

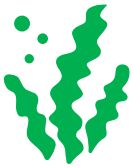
Approaches were formulated with consideration of structural, non-structural, and engineering with nature features.



Structural Measures are physical modifications designed to reduce the frequency of damaging levels of flood inundation. Examples of structural measures included in the initial array of approaches include berms, pump stations, deployable closure gates, and floodwalls.



Non-structural Measures are permanent or contingent measures applied to a structure that prevent or resist damage from flooding. Physical non-structural measures include actions that require modifications to a property or structure such as structure elevation, basement removal, or acquisition. Non-physical non-structural measures do not modify individual structures but rather focus on behaviors and plans that manage flood risk such as flood insurance, flood warning systems, and evacuation plans.



Engineering with Nature Measures refer to landscape features used to manage flood risk while restoring natural processes and providing ecosystem benefits. These landscape features may be natural (produced purely by natural processes) or nature-based (produced by a combination of natural processes and human engineering) and include features such as green stormwater infrastructure, living seawalls, and subtidal habitat/aquatic vegetation improvements.

Initial Thematic Approaches:

- **Approach 1 (No Action):** The No Action approach represents the baseline condition for the study area and assumes that no land-based or water-based coastal storm risk management improvements will be implemented.

- **Approach 2 (Non-Structural)** seeks to employ solely non-structural measures, which are permanent or contingent measures applied to a structure and/or its contents that prevent or provide resistance to damage from flooding. A fully nonstructural approach was considered in accordance with USACE guidance in the form of a building-level strategy for the study area, including buyouts and deployable floodwall structures around buildings.
- **Approach 3 (Structural On Land)** aims to reduce in-water impacts in the East River by placing all coastal storm risk management infrastructure above or inboard of the existing bulkhead. This alternative would not construct a waterfront esplanade on the outboard, or "wet" side of the floodwall. In this alternative, ferry terminals and piers would be reconstructed to be resilient to future tidal flooding, and a pump station would be constructed to manage drainage associated with the coastal storm risk management infrastructure.
- **Approach 4 (Structural In Water)** proposes building a shoreline extension into the East River, with coastal storm risk management infrastructure integrated within the new shoreline. In comparison to Approach 3, this approach would also expand access to the waterfront by introducing a new waterfront esplanade built on the new shoreline extension, on the "wet" side of the floodwall. In this alternative, ferry terminals and piers would be reconstructed to be resilient to future tidal flooding, and a pump station would be constructed to manage drainage associated with the coastal storm risk management infrastructure.
- **Approach 5 (Engineering with Nature)** considers only Engineering with Nature solutions and proposes wrapping the study area with an ecotone levee. Engineering with Nature measures refer to the landscape features used to manage flood risk while restoring natural processes and providing ecosystem benefits.

4.2.2 Screening of Approaches to Reach the Final Array of Alternatives

To arrive at the final array of alternatives, these five thematic approaches were screened using USACE Evaluation Criteria (efficiency, effectiveness, completeness, acceptability) and the study objectives.

USACE Evaluation Criteria were evaluated using the following ranking system:

- **Efficiency:** Efficiency is the extent to which an approach is the most cost-effective means of alleviating the specified problems and realizing the specified opportunities, consistent with protecting the Nation's environment. Approaches that were ranked high are the most cost effective, while low-ranking approaches are more costly.
- **Effectiveness:** Effectiveness is the extent to which an approach alleviates the specified problems and achieves the specified opportunities. High-ranking approaches protect the study area from both tidal and coastal flooding, with capacity to address the most opportunities. Low-ranking approaches do not fully protect the study area from tidal and coastal flooding and provide little to no capacity to address opportunities.
- **Completeness:** Completeness is the extent to which a given approach provides and accounts for all necessary investments or other actions to ensure the realization of the planned effects. Approaches that rank high in completeness integrate with adjacent flood protection projects and

existing infrastructure. Low-ranking approaches do not integrate with adjacent flood protection projects and/or existing infrastructure.

- **Acceptability:** Acceptability is the workability and viability of the approach with respect to acceptance by State and local entities and the public, and compatibility with existing laws, regulations, and public policies. Approaches that score high in acceptability maintain existing infrastructure and waterfront access. Low-scoring approaches either remove waterfront access or do not minimize the shoreline extension.

P&G Evaluation Table

Approach	Efficiency	Effectiveness	Completeness	Acceptability
1: No Action				
2: Non-Structural	Low	Low	Low	Low
3: Structural On Land	High	Medium	Medium	Medium
4: Structural In Water	Medium	High	High	Medium
5: Engineering with Nature	Low	Low	Medium	Low

Figure 3. Ranking of the Initial Thematic Approaches Compared to USACE Evaluation Criteria

Figure 3 presents the study's five initial thematic approaches compared to USACE Evaluation Criteria (efficiency, effectiveness, completeness, acceptability). The results rank the approaches from lowest to highest as follows: Non-Structural approach scored the lowest, followed by Engineering with Nature; Structural On Land; scored second highest, and Structural In Water scored highest.

The five approaches were also evaluated based on metrics derived from the study's updated objectives:

1. **Objective 1:** Over the 50-year period of analysis, manage the risk of coastal storm and flooding impacts to communities, public infrastructure (including financial, maritime, roadway, and other transportation assets), important societal resources, and the environment.
    a. Metric: Quantitative analysis of the assets protected. Approaches that reduce economic damages and practically protect properties in the study area for coastal storm surge and tidal flooding were ranked high. Approaches that do not practically protect properties in the study area or reduce economic damages were ranked low.
2. **Objective 2:** Improve the community's ability to recover from damages caused by coastal storms and floods and maintain ongoing functionality and reliability of surface and subsurface transportation systems by reducing the duration of interruption in services provided by man-made and natural systems.

a. Metric: Qualitative analysis of how a project would reduce service restoration time for structures in the study area. Approaches that reduce the duration of interruption in services for transportation assets in the study area for coastal storm surge and tidal flooding were ranked high. Approaches that do not reduce the duration of interruption services for transportation assets in the study area were ranked low.

3. **Objective 3:** Enhance resilience of critical infrastructure and manage risk to human life, health, and safety from coastal storm and flooding impact by ensuring vehicular, pedestrian, emergency/evacuation services are maintained and follow Federal ADA standards.

   a. Metric: Qualitative analysis of how a project would manage the risk of flooding and promote life safety in residential areas by ensuring access routes and emergency/evacuation services are maintained. Qualitative analysis of how a project would manage the risk of flooding and promote life safety in residential areas by ensuring access routes and emergency and evacuation services are maintained. Approaches that maintain access and emergency/evacuation routes to and from the waterfront are ranked high. Approaches that do not maintain access and emergency/evacuation routes to and from the waterfront are ranked low.

4. **Objective 4:** Manage coastal storm and flooding risks to improve community resilience and connectedness for socially vulnerable populations.

   a. Metric: Qualitative analysis of how a project would manage the risk of flooding in socially vulnerable communities and protect social networks and community connectedness by ensuring open space remains functional and accessible. Approaches that maintain publicly accessible open space, employ few deployable flood barriers, and integrate floodwalls into the landscape are ranked high. Approaches that do not maintain publicly accessible open space, employ few deployable flood barriers, and integrate floodwalls into the landscape are ranked low.

Figure 4 presents the five initial thematic approaches compared to the study's objectives. The results rank the approaches from lowest to highest as follows: non-structural approach scored the lowest, followed by Engineering with Nature; Structural On Land scored second highest, and Structural In Water scored highest.

Evaluation of alternatives against project objective metrics

Approach	Property Protected	Recovery Capacity	Access	Community Connectedness
1: No Action				
2: Non-Structural	Medium	Low	Low	Low
3: Structural On Land	High	High	Medium	Medium
4: Structural In Water	High	High	High	High
5: Engineering with Nature	Medium	Low	High	High

Figure 4. Ranking of the Initial Thematic Approaches Compared to Study Objectives

4.2.3 Final Array of Alternatives to be Considered Further and Evaluated in the EIS

Based on the screening of the thematic approaches using the USACE Evaluation Criteria and an average of the evaluation of study objectives, NYCEDC proposes that Approaches 3 and 4 be selected for further evaluation and refined into a final array of alternatives, in addition to the No Action Approach.

Figure 5 presents the five approaches compared to USACE Evaluation Criteria and the evaluation average of the study objectives. Overall, the results rank the approaches from lowest to highest as follows: the non-structural approach scored the lowest, followed by Engineering with Nature; Structural On Land scored second highest, and Structural In Water scored highest.

Evaluation Summary Table

Approach	Objectives (Avg.)	P&G Evaluation				Determination
		Efficiency	Effectiveness	Completeness	Acceptability	
1: No Action						Advance as no action alternative
2: Non-Structural	Low	Low	Low	Low	Low	Screen out due to evaluation performance
3: Structural On Land	Medium	High	Medium	Medium	Medium	Advance as on-land alternative due to evaluation performance
4: Structural In Water	High	Medium	High	High	Medium	Advance as in-water alternative due to evaluation performance
5: Engineering with Nature	Medium	Low	Low	Low	Low	Screen out due to evaluation performance

Figure 5. Evaluation of Results from Comparison of Initial Thematic Approaches to USACE Evaluation Criteria and Study Objectives

Approaches to Advance to Final Array of Alternatives

The following approaches will be advanced to the final array as alternatives. The alternatives will be evaluated in the EIS and will advance in the feasibility study for further refinement and evaluation.

Approach 1 (No Action) represents the baseline conditions for the study area and will advance in the plan formulation process as a standard of comparison. Approach 1 will advance as the **No Action Alternative**.

Approach 3 (On Land) ranked high in efficiency, as the shore-based measures avoid the high cost of shoreline extension. That said, it scored medium in completeness, effectiveness, and acceptability, as the constrained footprint along the bulkhead has limited capacity to address opportunities, and the shore-based floodwalls would cut off waterfront access. In addition, Approach 3 scored high in study objective goals 1 and 2 and medium on study objective 3 and 4. As such, Approach 3 will advance as **Alternative 3 (Bulkhead)**, proposing an exposed floodwall (15-18 feet tall) be constructed along the existing bulkhead. Ferry terminals and piers would be reconstructed to manage risks to future tidal flooding, and a pump station would be constructed to manage drainage associated with the coastal storm risk management infrastructure. Ring walls and flood gates would be installed around the base of each pier to enable pedestrian, vehicle, and emergency access during non-coastal flood conditions.

Approach 4 (In Water) ranked the highest on average of all evaluated approaches, scoring high in effectiveness and completeness and medium in efficiency and acceptability. In addition, Approach 4 scored high in study objectives 1, 2, 3, and 4. This is due to this approach's high capability to address opportunities, increase waterfront access, and integrate with adjacent coastal flood risk management projects.

After conducting a technical screening of multiple structural alignments and assessing their feasibility, two distinct alternatives were identified within Approach 4 to be further advanced and refined in the plan formulation process. **Alternative 4 (Medium Extension)** involves a medium-scale extension of the shoreline into the East River in a portion of the study area, elevating the waterfront by approximately 15-18 feet. This alternative buries the proposed floodwall under publicly accessible green open space. **Alternative 4A (Narrow Extension)** proposes a narrow shoreline extension into the East River, designed to elevate the shoreline to a passive level of protection for future tidal flooding. The extension would incorporate a partially buried floodwall with inaccessible green space on the wet and dry sides of the floodwall. In both Alternatives 4 (Medium Extension) and 4A (Narrow Extension), ferry terminals and piers would be reconstructed to manage risks due to future tidal flooding, and a pump station would be constructed to manage drainage associated with the coastal storm risk management infrastructure.

Approaches Screened Out

Approach 2 (Non-Structural) will not be advanced, as it was found to be infeasible due to the magnitude of required buyouts, high market values, disruption to landmarks and the Seaport Historic district, and loss of critical maritime infrastructure along the waterfront. Non-structural measures may be included as appropriate with the structural alternatives.

Approach 5 (Engineering with Nature) will not be advanced, because an ecotone levee was found to be infeasible. Due to the extensive footprint required, an ecotone levee would result in the loss of critical waterfront functions, including the removal of ferry terminals and all maritime operations, directly conflicting with study objectives to preserve existing transportation infrastructure, public access, and maritime operations. The ecotone levee construction would also involve placing large volumes of fill over or adjacent to subsurface transit infrastructure, risking disruption to subway tunnels and posing considerable technical challenges. Engineering with Nature measures may be included as appropriate with the structural alternatives.

Comprehensive Benefits Approach

The final array will be further evaluated using a comprehensive benefits approach, evaluating the alternatives across four categories: National Economic Development, Regional Economic Development, Environmental Quality, and Other Social Effects. This approach originates in USACE policy guidance to ensure a plan formulation process has carefully evaluated, calculated, and documented the totality of a proposed project's benefits and impacts to support USACE recommendations for potential future investments in water resources projects.

The **National Economic Development** account represents the increase in the net value of the national output of goods and services attributable to the project. The **Regional Economic Development** account provides a comprehensive understanding of how regional economic activity is distributed and influenced by alternatives through indicators such as income, employment, output, and population. The **Environmental Quality** account captures the non-monetary effects on ecological, cultural, and aesthetic resources, integrating environmental consideration into the decision-making process. Further study will examine the beneficial and adverse environmental quality effects of the final array of alternatives across the study area. Finally, the **Other Social Effects** account is essential to realize non-monetary effects of the project on the social fabric of the FiDi and Seaport community.

5. Anticipated Potential Environmental Effects

Anticipated effects are expected to include those associated with aquatic habitats, water quality, air quality, visual quality, infrastructure, transportation corridors, recreation features, and historic resources. Effects anticipated to require compensatory mitigation include terrestrial and aquatic habitats and water resources.

Effects on other resources are anticipated as benefits to recreational and transportation access. Other long-term benefits are anticipated related to socioeconomic resources (such as life safety, critical infrastructure, utilities, recreation, and the local economy) through the management of coastal flooding and sea level change.

6. Methodologies

Potential effects of proposed activities will be considered in accordance with Part 2.3 of the *Department of War National Environmental Policy Act Implementing Procedures*, April 30, 2026, which includes guidance as to the appropriate scope of analysis for an EIS. The guidance does not provide quantitative thresholds of significance for potentially affected resources, but states that the NEPA analyses should focus on whether the environmental effects of the proposed activities are significant, and effects should be discussed in proportion to their significance. "With respect to issues that are not of a substantive nature and do not meaningfully inform the consideration of environmental effects and the resulting decision on how to proceed, the EIS will include the briefest possible discussion to explain why those issues are not substantive and therefore not subject to any further analysis."[5]

The resource analyses and evaluations conducted for the Integrated Report/EIS will identify the potential for reasonably foreseeable effects; whether the anticipated effects would be adverse or beneficial; and avoidance, minimization, and/or mitigation measures for any identified adverse effects for each of the alternatives evaluated. **Table 1** shows the methodologies to be followed for the resource analyses. If necessary, NYCEDC, in collaboration with relevant resource agencies, will refine project-specific methodology for topics where variation from established procedures is appropriate. Each technical analysis will evaluate the construction-related effects, if applicable. Project construction would occur over multiple years. The analysis will assess existing and future conditions with and without the proposed activities under a range of alternatives for a 50-year period of analysis following construction. Although project structures will often function for longer than 50 years, forecasting economic and physical conditions and impacts beyond 50 years becomes uncertain, since conditions may change considerably over that length of time. For the purposes of analysis, and depending on the alternative, project implementation is expected with construction from 2030 through 2041. Project performance is quantified by estimating future damages through 2092, for a period of analysis of 50 years. Affected Environment and Environmental Consequences will be discussed by subarea for each alternative and compared to the future conditions expected under the No Action Alternative, which will be defined as part of the Integrated Interim Report. The No Action Alternative would include other planned infrastructure and development projects within the study area that

[5] Department of War. Department of War Implementation of the National Environmental Policy Act. April 3, 2026.

are foreseeable during the period of analysis but would not include comprehensive coastal storm risk management for the study area.

Table 1. Potential Environmental Issues and Methodology for Evaluation

Resource Category	Methodology
Water Resources including Wetlands, Floodplains, Surface Waters	Evaluate the proposed activities' potential to affect surface waters and wetlands in the study area in accordance with federal and state regulations. Conduct background research, field investigation to verify regulatory boundaries for surface water and wetlands identified through desktop evaluation; prepare wetland and surface water maps and report(s); and assess potential effects including impact type and approximate quantity on regulated surface waters and wetlands. Identify avoidance, minimization, and evaluate suitable mitigation measures (as needed) to satisfy regulatory requirements (as needed). Coordinate findings with the New York State Department of Environmental Conservation (NYSDEC) and USACE. Appropriate function and optimum condition of surface water bodies in New York City are set by NYSDEC and appear as water quality standards; groundwater quality standards are set by NYSDEC. Evaluation will assess the potential to affect water quality standards for surface waters within the study area. Coordinate with Water Quality and Stormwater Management analysis. For floodplains, perform a screening for floodplains by reviewing Federal Emergency Management Agency (FEMA) National Flood Hazard mapping and document the existing conditions and mapping for the study area. Determine whether Executive Order 11988 Floodplain Management applies to the proposed activities within the study area. Evaluate potential effects on flood control programs and floodplains. In accordance with applicable regulations, identify floodplain boundaries, assess the risks and effects on floodplain values, identify mitigation measures for adverse effects (as needed) to satisfy regulatory requirements (as needed).
Hydrology and Hydraulics	Evaluate the potential effects to hydrology conditions (e.g., changes in inflow, changes in water surface profiles, flow distribution, assessment of local and system-wide resultant impacts, and upstream and downstream impacts) based on hydrodynamic modeling and other modeling conducted to evaluate the potential effects of proposed activities. Determine whether proposed alternatives are feasible or safe under varying conditions (e.g., high-flow events, storm surges) and evaluate suitable mitigation measures (as needed). Effects could be related to coastal hydrology, currents, circulation, tides, tidal exchange, and waves. Consider direct (e.g., inundation) and indirect (e.g., sediment transport or water quality) impacts. Identify avoidance, minimization, and mitigation measures (as needed).

Resource Category	Methodology
Water Quality and Stormwater Management and Infrastructure	Evaluate the proposed activities' potential to affect water quality and stormwater management in accordance with applicable regulations. Conduct data collection regarding surface water bodies in the study area (coordinate with Water Resource analysis); assess the potential for soil erosion and sedimentation, and sediment disturbance resulting in increases in suspended sediment; assess temporary and permanent measures that could be used to avoid or minimize and control soil erosion, sedimentation, sediment resuspension, and surface water quality effects during and after construction; and identify permitting requirements. Water quality to be assessed related to maintaining or violating any water quality standards for the designated Use Classification for surface waters within the study area; additional sources of polluted runoff; and/or construction of new stormwater drainage facilities and how that would affect other resources. The effect on existing sewer and other infrastructure will be assessed with regard to these resources.
Aquatic Biota	Evaluate the proposed activities' potential to affect aquatic biota in accordance with applicable federal and state regulations. Conduct the Year 3 biological and habitat sampling (full year) to provide additional baseline information on fish, benthic invertebrates, plankton, and aquatic habitats within the aquatic study area in the lower East River. Results of this third year of biological and habitat sampling will be analyzed with the results from the first two years of sampling to provide the baseline biological and habitat information to characterize the existing aquatic resource conditions and evaluate potential impacts of the proposed activities. Sampling includes seasonal surveys to characterize benthic macroinvertebrates and substrate, the fish community using seine nets, bottom and mid-water trawls, baited fish traps, imaging sonar environmental DNA, and acoustic telemetry to monitor for the presence and distribution of acoustic-tagged Atlantic and shortnose sturgeon. Characterization of aquatic resources within other portions of the aquatic study area will be based on existing information combined with the results of the aquatic sampling program within the East River portion of the study area. After survey and field reconnaissance, assess potential effects to these resources, including impact type and approximate quantity; identify avoidance, minimization, and mitigation measures and/or permitting requirements (as needed). Coordinate findings with NYSDEC, USACE, National Oceanic and Atmospheric Administration (NOAA) Fisheries, and New York State Department of State.

Resource Category	Methodology
Terrestrial Natural Resources	Evaluate the proposed activities' potential to affect terrestrial resources including flora and fauna, in accordance with applicable federal and state regulations. Identify the ecological communities and habitats within the study area, including gardens, landscaped areas, small parks (as habitat - parklands, open space, and recreation areas will be evaluated separately), topsides of piers and waterfront structures (structures species adapt to in built environment), and significant sensitive, or designated resources in New York City, as applicable, within the study area. Conduct field reconnaissance at appropriate seasonal times for potential species including two different season surveys as relevant (one preliminary habitat characterization in late fall 2025 and one observational survey in late spring/early summer 2026). Evaluate the nature and extent of potential effects of the proposed activities on ecological communities and habitats including general determinations of the amount and type of vegetation to be disturbed, special habitats that could be damaged, and possible interruption of wildlife movements. Identify mitigation measures in consultation with the appropriate agencies (as needed).
Endangered and Threatened Species	Evaluate the proposed activities' potential to affect endangered, threatened, candidate, or special status aquatic and terrestrial species in accordance with applicable federal and state regulations. If species are identified, subsequent tasks will include documenting the habitat types in the vicinity and determining whether suitable habitat for the identified species is present within the study area. Assess effects on the species (as applicable) and identify avoidance, minimization, and mitigation measures as needed for adverse effects in consultation with appropriate agencies (as needed). The analysis will document all coordination with the United States Fish and Wildlife Service and NOAA Fisheries pursuant to Section 7 of the Endangered Species Act.
Air Quality	Evaluate the proposed activities' potential to affect air quality in accordance with the Clean Air Act. Emissions from Federal actions are regulated under 40 CFR§93 Subpart B General Conformity. Analysis will characterize the current designation for criteria air pollutants under the National Ambient Air Quality Standards, evaluate the proposed activities anticipated emissions from both land-based and water-based equipment, assess conformance with the State Implementation Plan, and determine if the project meets General Conformity thresholds. General Conformity analysis will result in either a Record of Non-Applicability (RONA) or Statement of Conformity (SOC). Mitigation will be identified and documented if required.

Resource Category	Methodology
Noise and Vibration	Assess operational and construction effects of the proposed activities for noise and vibration. Proposed activities would introduce pump stations, which would be considered a newly introduced permanent noise source. However, equipment associated with the pump stations would be expected to operate inside enclosed structures and would be designed to meet all applicable noise regulations and requirements (i.e., Subchapter 5, §24-227 of the New York City Noise Control Code and the New York City Department of Buildings Code). Consequently, noise generated from the pump stations would be assessed qualitatively. While the proposed actions are not anticipated to result in any other newly introduced noise sources, ferry and helicopter operations may be relocated closer to receptors. Given the nature of these sources, changes in operational noise will be evaluated according to guidance in the Transit Noise and Vibration Impact Assessment Manual (2018) published by the Federal Transit Administration (FTA). Due to the scope and duration of construction activity, including both stationary and mobile sources (i.e., equipment on site and worker auto and construction truck vehicular trips), construction noise will be addressed quantitatively. Conduct construction noise analysis according to guidance from Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual (2018)3 as well as from the Federal Highway Administration Roadway Construction Noise Model user guide. Although the construction noise analysis methods in the manual are not standardized criteria, they are often applied as guidelines for noise limits at sensitive land uses and used to describe noise levels that could result in a negative community response. As part of this quantitative noise construction analysis, determine the appropriate study area and suitable receptor locations, an existing conditions noise measurement program with locations throughout the study area will be conducted, potential sources of noise and vibration during construction of the proposed activities will be identified and predicted noise level increments will be assessed using appropriate Federal Transit Administration impact assessment methodology. If impacts are identified, noise and vibration abatement measures will be identified and evaluated for feasibility and reasonableness.

Resource Category	Methodology
Geology, Topography, Soils, and Groundwater	Identify geological resources, topography and groundwater (with reference to Water Resources section), within the study area. Resources characterized would include those on land and under surface water resources. Identify direct and indirect effects on geologic resources related to alterations of existing drainage patterns of the area and potential to result in substantial erosion or siltation on or off site; effects on channel or bank erosion/sediment loss; effects on bottom sediment within surface waters; and effects on underlying geology. Consider whether the proposed activities would result in decreasing groundwater supplies or interfere with recharge or potential to impede sustainable management of groundwater. Also consider whether activities would adversely alter the rate or direction of groundwater flow. Identify avoidance, minimization, and mitigation measures (as needed).
Hazardous, Toxic, and Radioactive Waste	Evaluate the proposed activities' potential to affect hazardous, toxic, and radioactive materials and waste in accordance with applicable federal and state regulations. Conduct a contaminated materials and hazardous substances assessment with reconnaissance as necessary to identify the potential of encountering hazardous and non-hazardous contaminated materials during the planned construction work. Identify measures that would be implemented during construction for the proper handling, transport, and disposal of any excess material to protect public health, worker safety, and the environment, and assess whether any post-construction controls may be warranted.
Recreation, Parklands/ Open Space	Evaluate the potential effects of the proposed activities on parkland within an appropriate study area, including an indirect study area. Information gathered should be for publicly and privately owned recreational, open space, and public use areas. The size, location, and types of uses should be documented. Potential effects to these resources could include the disruption or physical impact of a recognized recreational facility or activity or reducing access to or indirect effects (such as noise, air quality, and visual impacts) that could affect the experience of park users.

Cultural Resources (Archaeology and Architecture)	In accordance with Section 106 of the National Historic Preservation Act and its implementing regulations at 36 CFR Part 800: Protection of Historic Properties, tasks will include delineating a study area, or "Area of Potential Effects" (APE) appropriate for the activities anticipated to occur under the project alternatives which will consist of the Limits of Disturbance (LOD) and a larger area beyond the boundaries of the LOD where the project alternatives may have effects on historic properties, including physical effects and effects to the setting of historic properties; identifying historic properties (National Historic Landmarks, listed on or eligible for the National Register, locally designated by the New York City Landmarks Preservation Commission as landmarks or historic districts, and properties as yet not identified that may meet National Register eligibility criteria) within the APE; assessing effects on identified historic properties consistent with the Criteria of Adverse Effect as set forth in 36 CFR Part 800.5(a) under each of the project alternatives; and resolving adverse effects (if any). If present, resources considered may include archaeological resources such as precontact period archaeological sites; landfill and landfill-retaining structures; military structures and fortifications; river bottom deposits; streetbed infrastructure; domestic archaeological sites; historic period cemeteries/human remains; or submerged archaeological resources. Architectural resources could include historic waterfront infrastructure and historic maritime infrastructure. Local designations will be noted separately from National Register-listed and eligible properties as part of the cultural resources baseline and regulatory context. Direct, indirect, visual, setting, access, noise/vibration, and construction effects will be identified as applicable. Consultation to occur with the State Historic Preservation Officer, Advisory Council on Historic Preservation, and Section 106 Consulting Parties, including relevant and/or potentially affected federally recognized Indigenous Nations with respect to the identification of historic properties, potential effects on historic properties, and how any adverse effects will be resolved through the Section 106 consultation process. The results of this consultation will be summarized in the EIS. The EIS will also assess the potential archaeological sensitivity of the portion of the Area of Potential Effects that consists of the LOD as this is where ground disturbance and construction (including staging areas, access routes, construction means and methods, etc.) may occur as a result of the project alternatives and assess effects on any potential archaeological resources identified. The analysis will include the collection of archaeological data (e.g., previous archaeological investigations and previously identified archaeological sites) from the larger APE to inform the sensitivity determinations made for the LOD. The analysis will focus on the potential archaeological sensitivity of the LOD, including its potential to contain deeply buried archaeological sites and

Resource Category	Methodology
	submerged archaeological resources. To determine the potential for the LOD to contain such resources, relevant information from the APE and adjacent areas will be reviewed where available, such as previous archaeological and geomorphological investigations of waterfront and inundated areas in Lower Manhattan/New York Harbor, soil borings, historical maps and coastal charts, and the results of sonar scans of the river bottom. Avoidance, minimization, and mitigation measures (as needed) will be identified and described.
Transportation	Evaluate the proposed activities' potential effects on transportation resources in accordance with applicable federal and state regulations. Address transportation effects in the study area including temporary (construction) and permanent effects on movement of vehicles (major arterials, highway access), buses, access to subways and ferries, parking, and pedestrian and bicycle use and access. Major impacts would include permanent changes such as relocating or removing transportation elements and/or modifying the circulation pattern of a roadway that are not temporary construction effects. For construction, describe how maintenance and protection of traffic plans would follow applicable local regulations such as New York State Department of Transportation Highway Work Permits and New York City Department of Transportation Office of Construction Mitigation and Coordination Permits to reduce or eliminate temporary effects on transportation systems. Data from available sources from agencies such as New York State Department of Transportation and New York City Department of Transportation will be obtained at selected locations related to vehicular traffic, bicyclists, and pedestrians supplemented field observations as necessary. Conduct additional data collection as determined by gaps in what is publicly available. Identify mitigation measures in consultation with the appropriate agencies (as needed).

Resource Category	Methodology
Navigation	Characterize navigation resources within the study area including navigation channels with depth and width, navigation routes, existing shipping ports, ferry routes, dinner cruises and sightseeing tours, and shipping ports. Develop and summarize a base case for the existing marine traffic in the study area and the associated high-level destination information. Evaluate the proposed activities' potential effects on navigation and/or maritime activities in accordance with applicable regulations during construction and post-construction due to operation of proposed maritime elements. The New York State Navigation Law governs the rights of navigation on waterways in New York State including those in New York City. Review navigation and waterways plans associated with New York City. For the preferred alignment, if adverse effects are determined, further analysis would be required to detail potential avoidance, minimization, and mitigation measures.
Coastal Resources / Coastal Zone Management	Evaluate the proposed activities' potential to affect coastal resources and coastal zone management in accordance with applicable federal, state, and local regulations. Evaluate whether the proposed activities would be consistent with New York State coastal policies and the New York City Waterfront Revitalization Program (WRP). Initial steps should include the preparation of a New York City WRP Consistency Assessment form and preparation of a detailed assessment if required. Identify mitigation measures in consultation with the appropriate agencies (as needed).
Land Use, Zoning, and Public Policy	Evaluate the proposed activities' potential to affect land use, zoning and public policy in accordance with applicable federal, state, and local regulations. Use readily available information, including the New York City Department of City Planning's primary land use tax lot output (PLUTO) database and New York City's Zoning Resolution to identify current land use and applicable zoning districts within the study area. Review relevant public policies such as the New York City Comprehensive Waterfront Plan. Characterize the land use changes associated with proposed activities to a level of detail sufficient to support other technical areas and discuss the proposed activities' consistency with zoning (if applicable) and relevant public policies.

Resource Category	Methodology
Socioeconomic Conditions (including Neighborhood Character)	Characterize existing socioeconomic conditions through quantitative analysis of population, housing, employment, and economic activity within census tracts that fall largely within the study area. Compile data from: U.S. Census Bureau's Decennial Census and American Community Survey, New York State Department of Labor's Quarterly Census of Employment and Wages, New York City Department of City Planning's Population FactFinder and PL UTO datasets, additional proprietary sources, site reconnaissance, land use plans, and renderings for visual impact evaluation. Conduct fieldwork/site visit to confirm conditions. Visual documentation will be supported through site photography mapping. Analyze displacement of existing residents or businesses and reconfiguration for waterfront commercial uses; economic activity (estimating changes in business accessibility, customer base, or operations related to project implementation); resident characteristics including persons with disabilities, elderly populations (i.e., those over 65 years of age), and transit-dependent populations, and neighborhood character (effects on built form, land use continuity, and community cohesion, and viewshed, scale, and spatial experience). Metrics will include changes in employment and land use mix, displacements, and qualitative descriptions of community character and visual quality. Identify avoidance, minimization, and mitigation measures in consultation with the appropriate agencies (as needed).
Visual Resources	In support of demonstrating consistency with the New York City WRP and New York State Coastal Management Program, characterize existing visual access to the waterfront and assess the potential for the proposed activities to reduce existing visual access caused by the scale, design and location of the proposed activities in areas such as streets, parks, bridges and highways. Document existing conditions through site visits, during which photographs of corridors or mapped streets that terminate at the shoreline or within the waterfront block, will be taken to capture baseline views and visual characteristics. Use photographs to identify and annotate key features such as iconic views, visual corridors, and character-defining elements of the landscape. The selected views will form the basis for developing scenarios for each location representing the alternatives. Each scenario will be assessed to determine the level of potential visual impact (low, moderate, or high). The resulting viewsheds will provide a clear understanding of how each proposed alternative could alter aesthetics, sight lines, and public views to the waterfront and surrounding visual resources. Avoidance, minimization, and mitigation measures will be developed (as needed).

7. Identification of Cooperating and Participating Agencies

The USACE, as the lead federal agency, and NYCEDC **(Table 2a)** invited federal, state, and other appropriate parties to participate in the environmental review process by service as Cooperating or Participating Agencies (**Table 2b**). Necessary agency approvals or actions will be confirmed or modified during the preparation of the Draft Integrated Interim Report.

Table 2a. Lead Agency and Non-Federal Sponsor

Agency	Study Involvement
USACE	Lead Agency, Potential project funding
NYCEDC	Non-Federal Sponsor

Table 2b. Potential Cooperating and Participating Agencies

Potential Cooperating Agencies	Study Involvement
United States Environmental Protection Agency (USEPA) [a]	Coordination related to NEPA and Section 309, Clean Air Act
United States Department of the Interior, Fish and Wildlife Service	Section 7 Consultation pursuant to the Endangered Species Act (16 United States Code [U.S.C.] §§ 1531-1544; and 50 Code of Federal Regulations [CFR] Part 402)
United States Coast Guard	Property Acquisition, Potential consistency with Regulated Bridge - Section 9 of the Rivers and Harbors Act of 1899 (33 U.S.C. § 401)
NOAA Fisheries, Habitat and Ecosystem Services Division	Essential Fish Habitat Consultation - Magnuson-Stevens Fishery Conservation and Management Act (16 U.S.C. § 1801)
NOAA Fisheries, Protected Resources Division	Section 7 Consultation pursuant to the Endangered Species Act (16 U.S.C. §§ 1531-1544; 50 CFR Part 402)
New York State Department of State (NYSDOS)	Coastal Zone Consistency concurrence - 16 U.S.C. § 1456(c)
Federal Emergency Management Agency (FEMA)	Coordination related to resilience and floodplain issues
Federal Aviation Administration	Approvals due to modifications to East 34th Street Heliport

Potential Cooperating Agencies	Study Involvement
Federal Transit Administration	Potential financial interest in the Whitehall Ferry Terminal via previous federal grants or loans
National Park Service (NPS)	Presence of National Historic Landmarks in study area
New York State Department of Environmental Conservation (NYSDEC)	Section 401 Water Quality Certification pursuant to the Clean Water Act - Environmental Conservation Law Article 15, 6 New York Codes, Rules and Regulations (NYCRR) Parts 700-704, State Pollutant Discharge Elimination System Permits, Protection of Waters, Tidal Wetlands, New York Endangered Species Act, 014 Community Risk and Resiliency Act

Note:
[a] Section 309 of the Clean Air Act authorizes the USEPA to review proposed actions of other federal agencies in accordance with NEPA and to make those reviews public.

In response to the USACE invitation, the following agencies have agreed to participate as Cooperating or Participating Agencies in the environmental review process:

- U S E P A
- NOAA Fisheries
- NPS
- NYSDEC
- NYSDOS
- USCG
- FEMA
- FTA

8. Applicable Laws, Policies, Regulations

Compliance with federal laws and regulations will be demonstrated throughout the planning and environmental review process. The anticipated relevant laws, policies, and regulations associated with the federal review process are included in **Table 3**.

Table 3. Anticipated Applicable Laws, Policies, Regulations

Law, Policies, Regulations	Agencies Involved
Clean Air Act (42 U.S.C. §7401), General Conformity	USEPA
Executive Order 11988 of 1977; United States Department of Transportation Order 5650-2, “Floodplain Management and Protection,” April 23, 1979	USACE in coordination with FEMA

Law, Policies, Regulations	Agencies Involved
Executive Order 11990 of 1977; United States Department of Transportation Order 5660.1A, "Preservation of the Nation's Wetlands," August 24, 1978	USACE
National Historic Preservation Act, Section 106 - 54 U.S.C. 300101 et seq.; 36 CFR Part 800 Abandoned Shipwreck Act of 1987 (43 U.S.C. 2101), if applicable	USACE in consultation with the Advisory Council on Historic Preservation and the New York State Historic Preservation Office
Clean Water Act (33 U.S.C. §§ 1251et seq. [1972])	USACE USEPA
Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. § 403), Navigation	USACE
Section 14 of the Rivers and Harbors Act of 1899 (33 U.S.C. § 408), Alteration of a federal project (navigation channel)	USACE
Section 9 of the Rivers and Harbors Act of 1899 (33 U.S.C. § 401), United States Coast Guard Regulated Bridge	United States Coast Guard
Fish and Wildlife Coordination Act 1934 (16 U.S.C. 661-667e)	United States Fish and Wildlife Service
Marine Mammal Protection Act of 1972 (16 U.S.C. 1361 et seq.)	NOAA Fisheries Office of Protected Services
Endangered Species Act, Section 7 - 16 U.S.C. §§ 1531-1544; 50 CFR Part 402	United States Fish and Wildlife Service, and NOAA Fisheries Office of Protected Services
Magnuson-Stevens Fishery Conservation and Management Act (16 U.S.C. § 1801), Essential Fish Habitat	NOAA Fisheries Office of Habitat Conservation
Clean Water Act, Section 401 Water Quality Certification - Environmental Conservation Law Article 15, 6 NYCRR Parts 700-704	NYSDEC
Water Pollution Control Environmental Conservation Law Article 17, 6 NYCRR Part 750), State Pollutant Discharge Elimination System Permits	NYSDEC
Water Resources (Environmental Conservation Law Articles 15, 24, 6 NYCRR Part 608)	NYSDEC
Tidal Wetlands Permit - Environmental Conservation Law Article 25	NYSDEC

Law, Policies, Regulations	Agencies Involved
New York State Endangered Species Act - Environmental Conservation Law Article 1, Title 5 § 11-0535; 6 NYCRR Part 182	NYSDEC
2014 Community Risk and Resiliency Act, as amended by the 2019 Climate Leadership and Community Protection Act, requires that applicants for permits issued for major projects in all regulatory programs covered by the Uniform Procedures Act (6 NYCRR Part 621)	NYSDEC
Coastal Zone Management Act - 16 U.S.C. § 1456(c)	New York State Department of State
Staging Approval (under FDR Drive)	New York State
New York State Public Lands Law Chapter 46, Article 6, § 75, Lands Underwater Permit or Easement	New York State Office of General Services
Federal Aviation Act of 1958, as amended; primarily codified in U.S.C. Title 49, and implemented through 14 CFR Part 157, Federal Aviation Administration airspace review and approval (Forms 7460 [obstruction to airspace] / 7480 [landing area proposal])	New York State Department of Transportation in coordination with the Federal Aviation Administration
Local Law 197-a / Local Waterfront Revitalization Program (Local Plan in accordance with Section 197-a of the City Charter), Local Waterfront Revitalization Program Consistency (required as part of New York State Department of State consistency determination)	New York City Department of City Planning

Notes:

1. Local permits and approvals may be required for proposed activities, and those will be addressed in a subsequent environmental analysis that would satisfy State Environmental Quality Review Act (SEQRA) and New York City Environmental Quality Review requirements.

2. NYCEDC and the United States Coast Guard will determine the appropriate mechanism and associated processes/approvals for incorporating the United States Coast Guard site into the coastal storm risk management infrastructure, as needed, while maintaining current United States Coast Guard operations.

9. Agency Coordination and Public Engagement

As part of the NYCEDC's preparation for the Draft Integrated Interim Report, NYCEDC also prepared a plan for public involvement and agency coordination for the duration of the study's preparation. The plan identifies several opportunities for agency and public engagement including during the EIS scoping period and after the Draft Integrated Interim Report is prepared and released for review. These periods of review are accompanied by in-person and virtual meetings that provided multiple opportunities for all interested parties to share feedback on the materials presented, the proposed activities, and the Section 203 and

NEPA process in general. The scoping presentation presented during the meetings and information boards shared on the website and during the in-person meetings are included as **Attachments A** and **B**.

The public scoping comment period was held from May 28, 2026 through July 23, 2026. The in-person meeting was held on June 23, 2026 and two virtual meetings were held on June 25, 2026 and July 16, 2026.

NYCEDC developed a study-specific website that includes project information as well as the EIS scoping period materials and meeting schedule (https://edc.nyc/environmental-review). This website will continue to be updated on the study's progress. There is also a FiDi FORGE mailing list that anyone can join to receive emailed notifications of website updates and scheduled meetings.

To ensure that a full range of issues is addressed in the Draft Integrated Interim Report and potential issues are identified, comments and suggestions were invited from all interested parties. Scoping comments and questions regarding the Draft Integrated Interim Report or the National Environmental Policy Act of 1969 (NEPA) process were accepted at the three scoping meetings and otherwise requested to be sent to the NEPA POC, Cheryl Alkemeyer, NEPA by email at: CENAN-FiDiFORGE-203-Study@usace.army.mil.

10. Schedule for the Decision-Making Process

The anticipated schedule is outlined in **Table 4**. The Notice of Intent was published on the NYCEDC website on May 27, 2026 (**Attachment C**).

Table 4. Anticipated Integrated Report Schedule

Milestones	Dates
Public Notice/Notice of Intent	May 27, 2026
Public Scoping Comment Period	May 28, 2026 through July 23, 2026
Publish Draft Integrated Interim Report; Public Review Period	May 2027 through July 2027 (anticipated)
Public Hearings (one in-person, and one virtual)	July 2027 (anticipated)
USACE Publishes Notice of Availability of Combined Final Integrated Report/NEPA Record of Decision	March 2028 (anticipated)

11. Responses to Comments

This section contains the substantive comments received during the public scoping period for the FiDi FORGE Integrated Interim Report. The public review period began when NYCEDC and USACE published the Notice of Intent on the NYCEDC website on May 27, 2026, and the public comment period began the following day on May 28, 2026. The review period extended to July 23, 2026. The USACE received responses from 35 commenters, representing themselves or the organizations of which they are affiliated. The public had the opportunity to submit comments by email or during the in-person and virtual public

scoping meetings. Some submissions included multiple, distinct comments. Each comment was reviewed and categorized. Similar comments were grouped and summarized, and a response is provided to each summary comment. The original comment submissions and transcriptions of comments during the meetings are provided as **Attachment D**. The homepage of the NYCEDC website for the Study is provided as **Attachment E**.

The comments are grouped by broad topics and, in some cases, more specific subtopics. The list of commenters is also provided in this section.

11.1 List of Commenters

This section lists the interested parties who submitted comments during the public scoping period. Parties are listed by their name, how the comment was submitted, the date of the comment received, and assigned response number(s) that correspond to project/resource categories listed in Section 11 (**Table 5**). The response numbers indicate where relevant responses can be found to address the comments received. As noted, similar comments were grouped and summarized, and a response is provided to each summary comment.

Table 5. List of Commenters and Response References

Last Name / Affiliation	First Name	Comment Type	Date	Comment Number (s)
Albucher	Chelsea	Email	7/2/2026	7-4
Austin (Environmental Protection Agency)	Mark	Email	7/23/2026	1-24, 2-4, 4-7, 5-2, 5-6
Campo	John	Email	7/11/2026	1-17
Caso (New York Building Congress)	Carlo	Email	7/21/2026	1-9
Chiarella (National Oceanic and Atmospheric Administration)	Louis	Email	7/7/2026	5-14
Cohen (Battery Conservancy)	Hope	Transcription 6/25/2026 Meeting	6/25/2026	7-3
DeCerbo (Real Estate Board of New York)	Maddie	Email	7/15/2026	8-9
Deutsch (Councilmember Christopher Marte)	Max	Transcription 6/23/2026 Meeting	6/23/2026	5-1, 5-20, 5-22, 8-1
Donohue (American Institute of Architects New York Chapter)	Bria	Transcription 7/16/2026 Meeting, Email	7/16/2026	1-5, 1-9, 1-12, 1-13, 2-5, 2-6, 2-8, 2-9, 4-1, 5-16, 6-4

Last Name / Affiliation	First Name	Comment Type	Date	Comment Number (s)
Fox (Waterfront Committee, City Club of New York)	Tom	Transcription 6/25/2026 Meeting	6/25/2026	2-4, 4-2, 5-7, 5-15, 8-5
Fox Shapiro (The City Club of New York)	Tom John	Email	7/23/2026	1-19, 1-20, 1-22, 1-23, 1-24, 2-1, 2-8, 2-15, 2-16, 2-17, 2-18, 2-19, 2-21, 3-3, 3-7, 4-2, 4-6, 4-9, 5-15, 5-16, 5-32, 5-33, 5-34, 6-5, 6-6, 8-2, 8-6
Freudenberg	Robert	Transcription 7/16/2026 Meeting, Email(s)	7/16/2026 7/2/2026 7/23/2026	1-19, 1-20, 1-21, 1-22, 2-8, 4-5, 5-9, 7-2, 7-5
Gallay (The Resilient Coastal Communities Project (Columbia University's Center for Sustainable Urban Development and in partnership with the New York City Environmental Justice Alliance))	Paul	Transcription 6/23/2026 Meeting, Email	6/23/2026 7/23/2026	1-3, 1-14, 1-15, 2-3, 3-2, 4-4, 5-8, 7-5, 7-6, 8-6
Gamils (RiverKeeper)	Drew	Transcription 7/16/2026 Meeting, Email	7/16/2026 7/23/2026	1-19, 1-20, 1-21, 2-4, 2-8, 2-11, 2-12, 5-9, 5-10, 5-11, 5-12, 5-17
Gayford	Luke	Transcription 6/23/2026 Meeting	6/23/2026	2-2, 2-3
Grubler	Mitchell	Email	7/11/2026	1-5, 1-8, 1-17, 1-18, 2-3, 5-28, 7-2
Habstritt	Mary	Transcription 6/25/2026 Meeting	6/25/2026	4-3, 7-4
Hawthorne	April	Email	6/26/2026	3-3, 3-4, 3-5
Hughes (Financial District Neighborhood Association)	Catherine	Transcription from 6/23/2026 and 7/16/2026 Meetings, Email	6/23/2026 7/16/2026	1-4, 1-5, 1-6, 4-1,5-1, 5-26, 6-1, 6-2, 8-3, 8-4
Jackson (Metro Flood Defense)	Sam	Transcription 6/25/2026 Meeting	6/25/2026	6-3
Jager	Jennifer	Email	7/11/2026	1-5, 1-12, 1-16, 1-17

Last Name / Affiliation	First Name	Comment Type	Date	Comment Number (s)
Johannessen Meltzer Bommer (Manhattan Community Board 1)	Martine Tammy Zach	Transcription 7/16/2026 Meeting, Email	6/25/2026 7/16/2026	1-5, 1-9, 1-12, 1-20, 1-21, 1-22, 1-24, 2-8, 2-14, 2-15, 3-6, 4-8, 5-1, 5-4, 5-13, 5-18, 5-21, 5-30, 5-31, 5-32, 8-2, 8-6, 8-8
Kramer (Battery to Bridges Coalition)	Michael	Transcription 6/23/2026 Meeting, Email	6/23/2026	1-1, 1-2, 1-8, 1-18, 3-1, 4-1, 5-19, 5-22, 5-23, 5-24, 5-25,7-2, 8-2, 8-3
Lobel	Meriam	Email	7/23/2026	8-4
Lorenzini (NYC Department of Records & Information Services (DORIS))	Michael	Email	7/13/2026	8-10
Luebke (SWIM Coalition)	Michelle	Transcription 7/16/2026 Meeting, Email	7/16/2026 7/23/2026	1-19, 1-20, 1-21, 2-3, 2-4, 2-6, 2-12, 3-2, 3-5, 4-5, 5-5, 5-8, 5-9, 5-11, 6-5, 7-2, 8-6
Mak	Sam	Email	7/12/2026	5-3
Naglich	Mandy	Email	7/14/2026	1-5, 5-28
Olds	Susan	Email	7/16/2026	1-5, 5-19
Simpson	Tom	Transcription 6/23/2026 Meeting, Email	6/23/2026 7/14/2026	1-5, 1-7, 1-9, 1-10, 1-11, 1-18, 5-19, 5-27
Silverberg	Veronica	Email	7/20/2026	1-3, 1-5, 3-2, 3-3, 5-3, 5-19, 5-28, 6-7, 7-2
Taba (Waterfront Alliance)	Tyler	Transcription 7/16/2026 Meeting, Email	7/16/2026 7/23/2026	1-15, 1-19, 1-22, 1-23, 2-8, 2-13, 4-1, 4-6, 5-29, 6-2, 6-4, 7-1, 7-8, 8-7
Tanikawa (New York City Soil and Water Conservation District)	Shino	Transcription 7/16/2026 Meeting	7/16/2026	1-20
Wright (American Institute of Architects New York Transportation + Infrastructure Committee)	Jim	Email	6/25/2026	7-7
Wu	Jason	Email	6/29/2026	2-10

11.2 Plan Formulation

Comment 1-1: The analysis should study reasonable alternatives that protect existing public assets and result in public benefits.

Response: The Integrated Interim Report, also discussed in **Section 4** of this report, will outline the process by which reasonable alternatives were developed as well as the criteria used to evaluate them. The report will also include study objectives, constraints and opportunities, including the protection and enhancement of community assets.

Comment 1-2: Piers 15 and 19 should be discussed in the analysis of alternatives, and the purpose and need for Pier 19 should be disclosed.

Response: As a part of this planning process, the NYCEDC identified maritime infrastructure along the waterfront that would become vulnerable to monthly and tidal flooding through the 21st century. These assets are planned to be reconstructed at a higher elevation as part of the coastal storm risk management project, thereby protecting these piers from future disruption. This assumption is shared by all the alternatives considered as a part of FiDi FORGE.

There are several challenges with reconstructing Pier 15, including: higher costs of reconstruction; concerns surrounding limited visibility, increased difficulty of wayfinding, and poor emergency access from land caused by the increased distance of the pier to the flood-protected gateway at Fulton Street.

In comparison, the construction of a new Pier 19 was found to create additional opportunity and flexibility for maritime programming; calmer water conditions and additional space for vessel operations through the construction of a marginal wharf; and improved pedestrian and emergency access to the pier through direct connection to the Peck Slip gateway.

Comment 1-3: The project should foster protection while also achieving commensurate goals having to do with habitat protection, community revitalization, and restorative justice.

Response: The purpose of FiDi FORGE Section 203 study is to manage coastal storm risk in the FiDi-Seaport neighborhood, while maintaining pedestrian and vehicular access to and from the waterfront. The Integrated Interim Report will evaluate alternatives and assess the potential for these alternatives to affect the natural, physical, built, and human environment within the study area and identify measures to minimize these effects where appropriate.

Comment 1-4: An alternative should include removing the Franklin D. Roosevelt East River Drive (FDR) ramp south of the Brooklyn Bridge.

Response: Modification or alteration of the FDR Drive, which is a New York State Department of Transportation asset, is outside the scope of this study. The Integrated Interim Report will evaluate potential effects of the alternatives on transportation and access within the study area.

Comment 1-5: Please consider maximizing publicly accessible passive and active green open space along the waterfront esplanade, including a separate protected bike lane. This area is heavily used by tourists and residents and providing park amenities should be incorporated into the design of the project.

Response: The purpose of FiDi FORGE Section 203 study is to manage coastal storm risk in the FiDi-Seaport neighborhood while maintaining pedestrian and vehicular access to and from the waterfront. The Integrated Interim Report will evaluate alternatives and assess the potential for these alternatives to affect the natural, physical, built and human environment within the study area and identify measures to minimize these effects where appropriate. Maintaining public accessibility and open space features are part of the project constraints.

Comment 1-6: Minimize footprint of bus loading/unloading for Staten Island Ferry Terminal.

Response: Detailed design of Peter Minuit Plaza will not be included in the Integrated Interim Report but could be considered as design is refined after completion of this study. The comment will be considered during subsequent design refinement, as applicable.

Comment 1-7: Alternative 3 seems to be incorporating a wall that will reduce views of the waterfront. Consider flip-up walls/gates to preserve the view. Reducing views is unacceptable.

Response: The Integrated Interim Report will evaluate potential effects of each alternative on visual resources and waterfront views. Deployable measures, including flip-up gates, were considered. Their applicability is limited in locations with significant wave action or potential vessel impacts; the report will describe the basis for the measures advanced for further evaluation.

Comment 1-8: Provide more detailed drawings that clearly depict project elements including, fill areas, pier removal and construction, construction phasing, public and maritime access, and water depths as well as information about impacts to resources.

Response: The Integrated Interim Report will include details of the alternatives considered that will demonstrate the extent of the physical disturbance as well as indirect effects to the resources present within the study area. Drawings and construction information will be used to prepare qualitative and quantitative analyses for the alternatives considered.

Comment 1-9: Many commenters did not support Alternative 3 due to its proposed implementation of floodwalls, which would reduce public access and impede waterfront viewing. Many commenters did not support Alternative 4A due to its resulting reduction in waterfront access compared to existing conditions and restricted waterfront views. Commenters expressed concern for greater congestion along remaining public sidewalks and access spaces. Many commenters supported Alternative 4 due to the enhanced public access to the waterfront.

Response: The purpose of FiDi FORGE Section 203 study is to manage coastal storm risk in the FiDi-Seaport neighborhood, while maintaining universal pedestrian and vehicular access to and from the waterfront. The alternatives were developed in accordance with the U.S. Army Corps of Engineers (USACE) guidance for evaluation under the Section 203 process. Feedback received on the alternatives will be integrated into the plan selection process, where practicable. The evaluation of alternatives and assessment of the environmental effects in the Integrated Interim Report will consider all the resources present and potentially affected within the study area, including waterfront views. Maintaining public accessibility and open space features are part of the project constraints.

Comment 1-10: The team should include criteria such as an alternative's ability to withstand flooding, non-mitigable interference with water and land transport, and provision of adequate access to views of the waterfront from positions along the bulkhead. Other criteria should include quality of public access to open space with views of the river and harbor, which should be weighted as the overriding criteria for scoring. Any quantitative evaluation used for scoring should consider value added, such as enhancement of the tourism economy and recreational value to city residents, in addition to cost to construct.

Response: The evaluation of alternatives and assessment of the environmental effects in the Integrated Interim Report will consider all the resources present and potentially affected within the study area, including waterfront views. Maintaining public accessibility and open space features are part of the project constraints. The economic evaluation of the alternatives will follow the U.S. Army Corps of Engineers (USACE) comprehensive benefits framework, which includes the four USACE accounts: National Economic Development (NED), Regional Economic Development (RED), Other Social Effects (OSE), and Environmental Quality (EQ). NED evaluates which alternative creates the biggest overall economic benefit for the country, for example by avoiding property damage. The NED account and project cost estimates will be used to evaluate the benefit cost ratio for each alternative. Recreation benefits will be evaluated as part of the comprehensive benefits analysis to select the tentatively selected plan, these results can be found in the economics appendix of the Integrated Interim Report. The economics appendix will document the economic justification for the alternatives being evaluated.

Comment 1-11: The parking strip under the FDR across from the New York City Fire Department (FDNY) firehouse on South Street should be incorporated into the project and repurposed as open space.

Response: Modification or alteration of the FDR Drive, which is a New York State Department of Transportation asset, is outside the scope of this study.

Comment 1-12: The FiDi FORGE project objectives insufficiently address components of the plan. All goals and strategies from EDC's FiDi Seaport Resiliency Master Plan should be incorporated, specifically that the selected alternative provide significant publicly accessible open space along the FiDi-Seaport shoreline and meet Americans with Disabilities Act (ADA) requirements to provide full access to these spaces for users of all abilities.

Response: The development of goals and objectives as well as study objectives and constraints are based on USACE requirements and guidance. Therefore, some of the goals and objectives of the original FiDi and Seaport Climate Resilience Plan may be recategorized based on that USACE method. The purpose of FiDi FORGE Section 203 study is to manage coastal storm risk in the FiDi-Seaport neighborhood. Based on input from the USACE and as part of the Feasibility Study plan formulation process, maintaining public accessibility, including ADA requirements, and open space features are characterized as part of the project constraints. Enhancements to the public waterfront are included as an opportunity for the study but cannot be included as an objective or constraint per USACE requirements around plan formulation.

Comment 1-13: A new objective should be added stating that nature-based solutions should be introduced where it is feasible to provide a multi-layered, coastal storm protection system

supplementing the structural protection system. Similarly, nature-based ecological strategies should be employed to maintain and protect marine habitat along the shoreline.

Response: USACE policies and procedures do not allow for specific solutions to be included in the planning objectives. Nature-based solutions such as ecological enhancements to the structural coastal storm risk management measures have been identified for the alternatives as an opportunity within the study area based on feedback received during the scoping process.

Comment 1-14: We suggest an alternative be considered that would be more of a compromise of alternatives already identified, which would include a bermed barrier but not the waterfront promenade. Such an alternative would reduce the environmental impact of the in-water fill, pile driving, and shading of other alternatives already under consideration. These issues should be considered before providing funding to augment the existing waterfront amenities in the FiDi FORGE study area.

Response: The study aims to maintain pedestrian, vehicular, and emergency access to the waterfront. Alternative 3 provides waterfront access to the piers via universally accessible ramps, whereas Alternative 4 and 4A extend into the river to incorporate access. Of those extending into the river, to fully bury the flood barrier system, more fill would be required in Alternative 4 compared to Alternative 4A. Alternative 4 already uses a maximum maintainable slope (1:3) to partially bury the floodwall. The extent of effects as well as the costs of different alternatives will be discussed in the Integrated Interim Report.

Comment 1-15: The alternatives analysis should consider more of a nature-based solution that incorporates features of other structure-based alternatives.

Response: The plan formulation process follows USACE guidance for evaluating structural, non-structural, and nature-based solutions approaches and alternatives. Implementing nature-based solutions, including ecological enhancements, integrated with a structural approach in the study area has been identified as an opportunity for the study area as part of the scoping process and will be further considered as part of the study. A solely nature-based solution is not feasible anywhere in the study area due to the required footprint, currents in the East River (high scour and erosion risk), and proximity to existing infrastructure. Due to all the complications of a solely nature-based approach, it was not advanced as an alternative.

Comment 1-16: Criteria for the evaluation of alternatives should include the Preservation of the historic South Street Seaport.

Response: The purpose of FiDi FORGE Section 203 study is to manage coastal storm risk in the FiDi-Seaport neighborhood, which includes the historic South Street Seaport. The Integrated Interim Report will outline the process by which reasonable alternatives were developed as well as the criteria used to evaluate them. The Report will also include project goals and objectives, including the protection of community assets, including historic properties. The potential effect on historic resources within the study will be evaluated in the study.

Comment 1-17: Criteria for the evaluation of alternatives should include keeping open access to the harbor with no permanent high walls that will obstruct harbor views, access, or utility.

Response: Maintaining waterfront access, as well as connections to subways, buses, and pedestrian circulation is a major consideration in the project constraints. The Integrated Interim Report will outline the process by which reasonable alternatives were developed as well as the criteria used to evaluate them. The Report will also include project goals and objectives, which include maintaining public access to the waterfront. Views are being considered as part of the socioeconomics & neighborhood character analysis.

Comment 1-18: FiDi FORGE should provide a balance of real flood protection for residents, schools, businesses, public housing, and critical infrastructure; meaningful public access; and a waterfront that serves the people that live here. The project should protect existing human, natural, and cultural resources as well as critical infrastructure. The project should also preserve and enhance public access and open space, provide shade and seating support recreation, and respect the area's neighborhood characteristics.

Response: The purpose of FiDi FORGE Section 203 study is to manage coastal storm risk in the FiDi-Seaport neighborhood, while maintaining universal pedestrian and vehicular access to and from the waterfront. The evaluation of alternatives and assessment of the environmental effects in the Integrated Interim Report will consider all the resources present and potentially affected within the study area. Maintaining public accessibility and open space features are part of the study objectives.

Comment 1-19: What is the methodology or decision-making process used to develop, compare, and eliminate alternatives? It is unclear what criteria were used to screen alternatives, how environmental impacts were weighed against engineering, cost, navigation, or resiliency objectives, and why certain concepts were dismissed while others advanced. Why are nature-based features not incorporated into areas where they are compatible with maritime uses?

Response: The plan formulation process follows USACE guidance for evaluating structural, non-structural, and nature-based solutions approaches and alternatives. Implementing nature-based enhancements integrated with a structural approach in the study area has been identified as an opportunity for the study area as part of the scoping process and will be further considered as part of the study. A solely nature-based solution is not feasible anywhere in the study area due to the required footprint, currents in the East River (high scour and erosion risk), and proximity to existing infrastructure. Due to these complications of a solely nature-based approach, it was not advanced as an alternative and will not be discussed as a part of the assessment of the environmental effects.

The plan formulation process will be further documented in the plan formulation chapter of the Integrated Interim Report. Each approach was evaluated qualitatively using the study objectives as well as the following USACE Evaluation Criteria: Efficiency, Effectiveness, Completeness, and Acceptability. Once screened, the initial array of approaches was used to develop the final array of alternatives. The alternatives will be evaluated using USACE comprehensive benefits framework, which includes the four USACE accounts: National Economic Development (NED), Regional Economic Development (RED), Other Social Effects (OSE), and Environmental Quality (EQ). NED evaluates which alternative creates the biggest overall economic benefit for the country, for example by avoiding property damage. Following USACE requirements the NED account and project cost estimates will be used to evaluate the benefit cost ratio for each alternative. These results can be found in the economics appendix of the Report.

Comment 1-20: USACE and NYCEDC should rigorously evaluate a reasonable hybrid alternative that incorporates engineering with nature wherever practicable while preserving necessary maritime infrastructure. If not feasible, the USACE and NYCEDC should explain why a hybrid approach could not incorporate nature-based features in those subareas where maritime activities do not conflict, rather than screening out the approach in its entirety based on impacts concentrated in specific locations.

Response: The plan formulation process follows USACE guidance for evaluating structural, non-structural, and nature-based solutions approaches and alternatives. Implementing nature-based solutions, including ecological enhancements, integrated with a structural approach in the study area has been identified as an opportunity for the study area as part of the scoping process and will be further considered as part of the study. A solely nature-based solution is not feasible anywhere in the study area due to the required footprint, currents in the East River (high scour and erosion risk), and proximity to existing infrastructure. Due to all the complications of a solely nature-based approach, it was not advanced as an alternative.

Comment 1-21: The environmental analysis must clearly explain what maritime uses or infrastructure would be affected by nature-based features (such as in Alternative 5), why those conflicts cannot be resolved through project design, and what analyses support the decision to screen out this alternative. General statements asserting that engineering with nature is incompatible with maritime activities are insufficient.

Response: The purpose of FiDi FORGE Section 203 feasibility study is to manage coastal storm risk in the FiDi-Seaport neighborhood. As will be documented in the Integrated Report, the only nature-based solution that can mitigate coastal storm risk in the study area context is an ecotone levee. This levee requires between 30:1 and 10:1 slopes on the flood slide of the structure to reach the current 1% annual exceedance probability (AEP) floodplain (11.2' NAVD88). The levee would need to extend between 140-360 feet into the East River to reach the appropriate elevation. This does not include the additional fill required at the toe (which is required to protect the levee from scour and erosion, which would be expected to be severe due to the currents in the East River) which could extend beyond the pierhead line. Due to this footprint, and the anticipated effects on the hydrodynamics of the East River, there is no practicable method to hybridize the ecotone levee with structural approaches in areas with maritime infrastructure (Whitehall Ferry Terminal, Battery Maritime Building, Pier 11, Pier 15, Pier 16, and Pier 17) or subsurface infrastructure (MTA Tunnels). However, the use of hybrid nature-based solutions such as ecological enhancements to the structural coastal storm risk management measures are still under consideration.

Comment 1-22: Please clarify that the alternatives being studied stem directly from the meaningful public process and deep technical analysis that resulted in the FiDi and Seaport Climate Resilience Plan. Given the years of engagement and ultimate community buy-in for that plan, it will be essential to understand what is different and what remains the same.

Response: The FiDi and Seaport Climate Resilience Plan laid the groundwork with a framework for coastal storm risk management infrastructure along the 0.9-mile stretch of shoreline between The Battery and the Brooklyn Bridge, with extensive community input. The project has entered the next phase towards implementation and funding through the preparation of an Integrated Interim Report, which will include a feasibility study and environmental

review of the proposed activities. In accordance with USACE policies and planning processes required for use in a Section 203 Feasibility Study (USACE Feasibility Report Format and Content Guide (Version 1.1, April 2023), the FiDi FORGE planning process will formally evaluate alternatives as part of the Integrated Interim Report to compare different ways to meet the purpose and need for the project.

The Section 203 process represents a partnership between USACE and the City of New York. Even though the NYCEDC has completed extensive design work to date as part of the previous FiDi and Seaport Climate Resilience Plan, the project will need to meet USACE review standards to receive authorization and appropriation of funds. The specific, rigorous analysis required by the USACE will inform the identification of a Recommended Plan/preferred alternative to advance to final design.

In the framework of the USACE process, objectives, opportunities, and constraints have prescribed roles in the evaluation of alternatives, and the NYCEDC has identified the desire to maintain open space and minimize natural resource effects as part of the project's implementation.

Comment 1-23: The project should include a shoreline extension with a combination of floodwalls, flood gates, and other coastal flood protection infrastructure integrated within landscaped berms; project tie-in to the adjacent Battery Coastal Resilience and Brooklyn Bridge-Montgomery Coastal Resilience (BMCR) projects; Natural and nature-based coastal resilience strategies to reinforce the flood protection and protect habitat; Upgrades to maritime uses and pier infrastructure along the waterfront, including the Staten Island Ferry Terminal, Governor's Island Ferry Terminal, NYC Ferry Terminal at Pier 11, Manhattan Waterfront Greenway, Battery Maritime Building, South Street Seaport Museum; and inland stormwater management to manage impacts from extreme rainfall events. Detail how the FiDi FORGE project is integrated with ongoing and surrounding resilience projects, including the Seaport Coastal Resilience Project, Battery Coastal Resilience Project, Battery Park City Resiliency Projects, Brooklyn Bridge-Montgomery Coastal Resilience (BMCR), and the USACE's larger New York-New Jersey Harbor and Tributaries Study (HATS).

Response: The alternatives to be evaluated in the Integrated Interim Report include coastal storm risk management features described in the comment, including shoreline extensions, floodwalls, flood gates, and berms. Each alternative ties into the adjacent Battery Coastal Resilience and Brooklyn Bridge-Montgomery Coastal Resilience (BMCR) projects. Implementing nature-based solutions, including ecological enhancements, integrated with a structural approach in the study area has been identified as an opportunity for the study area as part of the scoping process and will be further considered as part of the study. Maintaining the existing maritime infrastructure and managing coastal storm risk for the study area, including cultural resources such as the South Street Seaport Museum, are key study objectives. Regarding HATS, FiDi FORGE is being advanced under the same authority at HATS, but it is a separate initiative from HATS.

Comment 1-24: The EIS should clarify how the purpose and need differs from the goals and objectives of the study presented in the EIS Scoping Additional Information Document, including how the terms are used in the alternatives evaluation. The analysis should evaluate how effectively each alternative achieves the project's stated objectives and the broader goals, including measurable criteria to evaluate project performance and explain how the

proposed system can be adapted over time as climate science and flood risks evolve. The scoring system for how the five approaches are evaluated should be explained in detail and include information on what constitutes a "low," "medium," or "high" score in the P&G Evaluation or Evaluation of Alternatives Against Project Objective Metrics arrays.

Response: The Section 203 feasibility study and EIS (Integrated Interim Report) are required to be prepared in accordance with USACE policies and regulations. The report and EIS content are guided by the USACE Feasibility Report Format and Content Guide (Version 1.1, April 2023). As such, the study will document and is required to define a purpose and need, problems, opportunities, objectives, and constraints, which collectively informed the development of the initial array of approaches.

Each approach was evaluated qualitatively using the following USACE Evaluation Criteria:

Efficiency – "the extent to which an alternative plan is the most cost-effective means of alleviating the specified problems and realizing the specified opportunities, consistent with protecting the Nation's environment."

Effectiveness – "the extent to which an alternative plan alleviates the specified problems and achieves the specified opportunities."

Completeness – "the extent to which a given alternative plan provides and accounts for all necessary investments or other actions to ensure the realization of the planned effects. This may require relating the plan to other types of public or private plans if the other plans are crucial to realization of the contributions to the objective."

Acceptability – "the workability and viability of the alternative plan with respect to acceptance by State and local entities and the public and compatibility with existing laws, regulations, and public policies."

The scoring system includes Low, Medium, and High ratings for each of the Evaluation Criteria and study objectives were determined qualitatively using best professional judgement in coordination with the USACE. More details about this evaluation will be included in the narrative of the plan formulation chapter of the Integrated Interim Report.

After screening, the resulting alternatives are further evaluated using the USACE comprehensive benefits framework, which includes the four USACE accounts: National Economic Development (NED), Regional Economic Development (RED), Other Social Effects (OSE), and Environmental Quality (EQ). NED evaluates which alternative creates the biggest overall economic benefit for the country, for example by avoiding property damage. RED focuses on how a project helps the local or regional economy, such as supporting jobs and business activity. OSE considers how an alternative affects people and communities in ways that are not monetized, like safety, recreation, and quality of life. EQ evaluates how a project affects the natural environment, including plants, animals, water, and ecosystems. The alternative that maximizes the total net benefits across all four categories will be selected as the Tentatively Selected Plan. These results will be detailed in the economics appendix of Report. The USACE economic planning process is limited to 50 years following the full construction of the project. Following USACE standards, the report will include qualitative analysis of future adaptability over a 100-year planning horizon.

The plan formulation process, screening criteria, results of the accounts, and the supporting information, as conducted in accordance with USACE policies and regulations,

will be further documented in the plan formulation chapter and economics chapter of the Integrated Interim Report.

The plan formulation process will be further documented in the plan formulation chapter of the Integrated Interim Report.

11.3 Engineering Considerations

Comment 2-1: The analysis should also evaluate construction sequencing and identify opportunities to phase work in ways that preserve neighborhood access, support local businesses, maintain maritime and emergency response capabilities, minimize disruption to existing public spaces and waterfront activities, and reduce cumulative impacts over the duration of construction.

Response: The Integrated Interim Report will include a description of the construction phasing plan and that will be applied to the resources potentially affected such as public access to neighborhoods, businesses, and open spaces as well as maritime and emergency response capabilities.

Comment 2-2: Sea level effects are noticeable at the waterfront, and we are having predictions of over five (5) inches over the normal levels over the next few months.

Response: The Integrated Interim Report will characterize and discuss the risks to Lower Manhattan from sea level change.

Comment 2-3: There's no consideration for Brooklyn, Staten Island, or other areas that have been affected by coastal flooding.

Response: Resilience planning for Brooklyn, Staten Island, and other areas outside the FiDi FORGE study area is not part of this study. The report will describe relevant connections between FiDi FORGE and adjacent resilience initiatives, as appropriate.

Comment 2-4: The project will have pumps to evacuate water from Lower Manhattan. Can the water be retained under new structures, or treat the water prior to distribution into the natural waterways? How will each alternative alter stormwater management?

Response: The interior drainage strategy for FiDi FORGE will be outlined in the Integrated Interim Report. Multiple stormwater management strategies have been identified for the study area including detention, retention, as well as pumping. The Integrated Interim Report will discuss the interior drainage strategies evaluated, and which ones were dismissed from further consideration. A pump station would pull water directly from the interceptor and could not practicably include treatment before discharge in the East River.

Comment 2-5: Advance all components of design to the same level of development for all alternatives, including pedestrian access, pier uses and functions, and maritime infrastructure.

Response: The design will be at the level of detail necessary to assess effects of all alternatives considered under NEPA for the Integrated Interim Report to be authorized by the Assistant Secretary of the Army (Civil Works) and Congress. The NYCEDC is coordinating closely with the USACE to determine acceptable design maturity. Designs will be further refined for the Recommended Plan following the completion of the NEPA process.

Comment 2-6: The study should evaluate strategies to reduce the frequency and volume of Combined Sewer Overflow (CSO) discharges resulting from flooding such as detention tanks buried within the Plan's bermed landscape infill. By increasing the effective capacity of the local combined sewer system during flood events, CSO discharges could be reduced.

Response: Reducing combined sewer overflow frequency and volume across Lower Manhattan is not an objective of this study. The Integrated Interim Report will describe the interior-drainage strategies evaluated for FiDi FORGE and their anticipated function during storm events

Comment 2-7: The Integrated Interim Report should include a Basis of Design Manual that summarizes program requirements such as area or square footage, design criteria, and design reference standards. The program analysis should anticipate a 50-year life cycle for the components and incorporate flexibility for future growth and change.

Response: USACE integrated feasibility reports do not include basis of design reports (BODR). While a formal BODR will not be included, many of the same elements will be detailed in the engineering appendix and sub-appendices of the Integrated Interim Report. The engineering appendix will document the technical basis for the alternatives being evaluated.

Comment 2-8: The report should include updated cost estimates and a construction schedule. Cost estimates should include estimates for the mitigation of resource impacts. Alternative procurement and delivery methods should also be considered in this analysis to reduce costs, maintain schedule, and assure project quality goals.

Response: The Integrated Interim Report will include an evaluation of cost for each of the alternatives over the 50-year project design life. This cost estimate will consider anticipated construction phasing and required mitigation costs. The lifecycle analysis includes an estimate of the Operation, Maintenance, Repair, Replacement, and Rehabilitation (OMRR&R) for the tentatively selected plan. These details will be included in the cost engineering appendix of the Report. After congressional authorization of the project, the NYCEDC can consider alternative procurement and delivery methods to ensure the project is delivered in the most time- and cost-effective manner.

Comment 2-9: Include details of the alternatives in the Integrated Interim Report such as current bulkhead line and proposed seawall locations, areas of proposed shoreline extension infill, shading from existing and proposed over-water structures, contour changes in ground level elevations, building finished floor and roof elevations, elevations indicating criteria for projected sea level rise, tidal flooding, storm surge, and storm wave action.

Response: The Integrated Interim Report will include details of the alternatives, such as those mentioned in the comment, in the main report as well as the engineering and cost engineering appendices.

Comment 2-10: A recent article in Nature, titled "Sea level much higher than assumed in most coastal hazard assessments," documents findings that many of the sea level rise estimates are inaccurate. These findings should be considered in this coastal fortification project (https://www.nature.com/articles/s41586-026-10196-1).

Response: In the reference study, the NYC region is highlighted as an area where sea level rise estimates are accurate, unlike areas in the global south. FiDi FORGE relies on the NOAA

tide gage in The Battery, which has been collecting data on MSL since 1856, providing a robust understanding of historic trends in the Study Area. Following USACE procedures, the Integrated Interim Report will analyze the Low, Intermediate, and High Relative Sea Level Change Curves.

Comment 2-11: The EIS must identify the proposed footprints, including temporary and permanent impacts for each alternative, describing the anticipated methods of construction, including dredging, pile driving, shoreline armoring, and other in-water activities.

Response: The Integrated Interim Report will include an engineering appendix, which will detail the methods for in-water construction. The potential for these construction means and methods to result in short-term effects to aquatic biota due to increases in underwater noise, suspended sediment, and increased vessel movement, and to water quality will be assessed in the Integrated Interim Report, along with long-term effects to these same resources due to placement of fill and any increases in overwater coverage resulting from the proposed actions. Effects associated with each alternative will be presented.

Comment 2-12: The Integrated Interim Report should provide details regarding stormwater management and drainage infrastructure such as the modeling that has been conducted, the projected stormwater volumes each alternative's drainage system is designed to manage, and how the risk of combined sewer overflow will be addressed. The EIS must also disclose the anticipated volume and frequency of pump discharge into the East River during storm events and evaluate the potential water quality effects of discharging combined sewage and stormwater at this location, including any measures proposed to minimize impacts to water quality and marine life in the discharge area.

Response: Stormwater management and drainage infrastructure information will be included in the interior drainage sub-appendix of the engineering appendix in the Integrated Interim Report. See also Response to Comment 2-4.

Comment 2-13: The report should clearly identify the project's design elevation, planning horizon, and adaptive management strategy and infrastructure should be designed to accommodate future modifications and increases in elevation where necessary, without requiring wholesale reconstruction.

Response: The Integrated Interim Report will include the Tentatively Selected Plan's design elevation, 100-year planning horizon, and adaptation plan. The USACE economic planning process is limited to 50 years following the full construction of the project. Following USACE standards, the report will include a qualitative analysis of future adaptability over a 100-year planning horizon for the Tentatively Selected Plan. This adaptability analysis will also be in the engineering appendix.

Comment 2-14: How will this project integrate with the other adjacent resilience efforts as well as existing planning efforts for the neighborhoods in the study area?

Response: Each alternative considered would connect with the adjacent Brooklyn Bridge-Montgomery Coastal Resilience (BMCR) project near the Brooklyn Bridge. The alternatives have two southern tie-in options, one that connects to the adjacent South Battery Park City Coastal Resilience Project (SBPCR) and one that connects to high ground at Bowling Green.

Comment 2-15: The report should analyze how each approach will improve the capacity of stormwater / flood infrastructure. What climate scenarios and timeframes will be analyzed when comparing approaches to flood mitigation (e.g., with worsening climate conditions, protection using the projected 50-year floodplain, 100-year floodplain, 200-year floodplain, etc.)?

Response: Following USACE policy, the Integrated Interim Report will include an interior drainage analysis, exploring detention, retention, and pumping strategies related to the construction of the coastal storm risk management project. The economics analysis will consider the USACE High, Medium, and Low Relative Sea Level Change projections as well as a suite of storms ranging from the 99% AEP (1-year storm) to 0.2% AEP (500-year storm) over the 50-year period of analysis (2042 to 2092). The USACE economic planning process is limited to 50 years following full construction of the project. Following USACE standards, the report will also include a qualitative analysis of future adaptability over a 100-year planning horizon.

Comment 2-16: The study should explore using existing infrastructure, including the FDR, to improve flood protection, minimize environmental impacts, and maximize public benefit.

Response: The Integrated Interim Report will outline the process by which reasonable alternatives were developed as well as the criteria used to evaluate them. The Report will also include project goals and objectives, including the protection and enhancement of community assets. Modification or alteration of the FDR Drive, which is a New York State Department of Transportation asset, is outside the scope of this study. The project should require a continuous line-of-protection plan and a segment-by-segment design-basis table for FiDi FORGE and each adjoining project. For every segment and tie-in, the report should disclose the vertical datum, design event, planning year, sea-level-rise assumption, passive and structural protection elevations, freeboard, deployable elements, closure points, residual risk, and adaptation provision. The EIS will explain how the individual projects are designed to work together to prevent flooding from behind completed flood protection systems and identify any measures needed to avoid unintended vulnerabilities at the interfaces between projects.

To mitigate coastal storm risk, each alternative must provide independent utility and effectively close the compartment off from tidal and storm surge flooding. The design condition of the preferred alternative, referenced in the Integrated Interim Report as the Tentatively Selected Plan, will be included in the Integrated Interim Report with details in the engineering appendix.

Comment 2-17: The EIS should test mismatched design standards among FiDi FORGE and the adjacent projects - map every route by which water could enter behind completed protection and identify the entity responsible at each interface. This should include assessing whether differences in design flood elevations (DFE), alignments, or project sequencing could allow floodwater to bypass higher levels of protection by entering protected areas from adjacent or inland segments.

Response: Each alternative considered in FiDi FORGE connects with the adjacent Brooklyn Bridge-Montgomery Coastal Resilience (BMCR) project to the north near the Brooklyn Bridge. The alternatives have two southern tie-in options, one that connects to the adjacent South Battery Park City Coastal Resilience Project (SBPCR) and one that connects to high

ground at Bowling Green. FiDi FORGE has been developed in close concert with the suite of Lower Manhattan resilience projects to ensure a continual line of protection along the shoreline. The engineering appendix will include discussion about how these tie-ins will be managed as well as the adaptability of the adjacent projects.

Comment 2-18: The proposed methodology for Water Quality and Stormwater focuses primarily on potential impacts to existing infrastructure rather than evaluating how each alternative improves stormwater management and interior drainage capacity. The analysis should include a defined compound-flooding test matrix pairing rainfall, tide, coastal surge, sea-level rise, and groundwater conditions, with the timing relationship among those hazards stated explicitly. The EIS should state whether collection, sewer conveyance, storage, gates, pumping, outfalls, and operating controls are unified, coordinated but separate, or independent.

Response: The interior drainage strategy for FiDi FORGE will be outlined in the Integrated Interim Report. Groundwater flooding is not an expected flood pathway in the study area. Multiple stormwater management strategies have been identified for the study area, including detention, retention, and pumping. The Integrated Interim Report will discuss the interior drainage strategies evaluated, which were dismissed from further consideration, and why. The environmental analysis will evaluate the effects of the interior drainage strategy developed for each alternative on relevant resources.

Comment 2-19: The Integrated Interim Report should disclose model boundaries, calibration and validation, rainfall distributions, wastewater inputs, boundary conditions, assumptions about adjacent projects and interceptor gates, and uncertainty. It should test blocked outfalls, gate nondeployment, power loss, pump outage, and conveyance failure and report flood depth, extent, duration, sewer surcharge, combined-sewer-overflow volume, and recovery time. Pump analysis should identify capacity, redundancy, backup power, discharge constraints, maintenance access, and operating responsibility.

Response: This analysis will be included in the interior drainage sub-appendix of the Integrated Interim Report. The sub-appendix associated with this resource will document the inputs and results of the hydrologic and hydraulic modeling, stormwater analysis, and proposed interior drainage solutions.

11.4 Economic Considerations

Comment 3-1: The Interim Integrated Report should analyze whether new ferry infrastructure that is already planned nearby can reduce the need for additional in-water construction elsewhere. The community should not be asked to accept both demolition and new pier construction without a clear explanation of why existing or already-planned infrastructure cannot be used more efficiently.

Response: As a part of this planning process, the NYCEDC identified maritime infrastructure along the waterfront that would become vulnerable to monthly and tidal flooding through the 21st century. These assets are planned to be reconstructed at a higher elevation as a part of the coastal storm risk management project, thereby protecting these piers from future disruption. This assumption is shared by all the alternatives considered as a part of FiDi FORGE. The cost to demolish and reconstruct the piers to be resilient to future tidal

flooding will be included in the cost engineering appendix in the Integrated Interim Report. The cost engineering appendix will document the cost estimates for the alternatives being evaluated. See also Response to Comment 1-18.

Comment 3-2: The project implemented should consider the anticipated budget of the ultimate proposal, as whatever is invested in this plan for protection and amenity is not available to protect other coastal areas, which also should be maintained for quality of life, improving social cohesion and improving natural resource protection. Balancing protection versus amenities is important.

Response: The alternatives will be evaluated using USACE comprehensive benefits framework, which includes the four USACE accounts: National Economic Development (NED), Regional Economic Development (RED), Other Social Effects (OSE), and Environmental Quality (EQ). Consideration of these four accounts ensures that the coastal storm risk management, economic, social, and environmental effects of the alternatives are included in plan selection. Following USACE requirements, the NED account and project cost estimates will be used to evaluate the benefit cost ratio for each alternative; these results will be in the economics appendix of the Integrated Interim Report.

Regarding balance with respect to other coastal areas, the NYCEDC is a close partner of the Bureau of Coastal Resiliency at New York City Department of Environmental Protection, who's tasked with advancing citywide resiliency efforts.

Comment 3-3: The analysis should include economic resilience beyond avoided property damage. The National Economic Development (NED) account captures avoided physical damage and emergency costs but understates the economic value at risk in a central business district of this scale. The Draft Integrated Interim Report should populate the Regional Economic Development account with quantified business-interruption, employment, and output effects, and should address in the Other Social Effects account the effects this framework tends to omit as non-monetizable, tax-base stability, tenant and investor confidence, and Lower Manhattan's continued competitiveness as a global financial center.

Response: The alternatives will be evaluated using USACE comprehensive benefits framework, which includes the four USACE accounts: NED, Regional Economic Development (RED), Other Social Effects (OSE), and Environmental Quality (EQ). NED evaluates which alternative creates the biggest overall economic benefit for the country, for example by avoiding property damage. RED focuses on how a project helps the local or regional economy, such as supporting jobs and business activity. OSE considers how an alternative affects people and communities in ways that are not monetized, like safety, recreation, and quality of life. EQ evaluates how a project impacts the natural environment, including plants, animals, water, and ecosystems. The alternative that maximizes the total net benefits across all four categories will be selected as the Tentatively Selected Plan. These results will be detailed in the economics appendix of the Integrated Interim Report.

Comment 3-4: The economic considerations of the study should consider transportation as economic infrastructure, the systems through which the district functions economically and a direct determinant of economic resilience. The analysis should consider how each alternative maintains the reliability of these networks during and after storm events.

Response: NYCEDC understands the importance of the transportation assets in the study area, both for physical travel and for the economy. The Integrated Interim Report will evaluate transportation impacts as part of the National Economic Development (NED) account and as a resource category in the environmental review.

Comment 3-5: The Integrated Interim Report should situate its economic case within the established evidence that pre-disaster mitigation outperforms post disaster rebuilding. The report should reflect this avoided rebuilding in its cost benefit analysis.

Response: The alternatives will be evaluated using USACE comprehensive benefits framework, which includes the four USACE accounts: National Economic Development (NED), Regional Economic Development (RED), Other Social Effects (OSE), and Environmental Quality (EQ). NED evaluates which alternative creates the biggest overall economic benefit for the country, for example by avoiding property damage. Following USACE requirements, the NED account and project cost estimates will be used to evaluate the benefit cost ratio for each alternative. These results can be found in the economics appendix of the Report.

Comment 3-6: How will economic, environmental, and social benefits of each climate resilience strategy be evaluated and weighted in the analysis?

Response: The alternatives will be evaluated using USACE comprehensive benefits framework, which includes the four USACE accounts: NED, Regional Economic Development (RED), Other Social Effects (OSE), and Environmental Quality (EQ). See comment response 3-3 for more details on the USACE accounts. The alternative that maximizes the total net benefits across all four categories will be selected as the Tentatively Selected Plan. These results will be detailed in the economics appendix of the Integrated Interim Report.

Comment 3-7: The report should address how the different alternatives would affect the cost/benefit analysis of each existing HATS alternative including but not limited to the Tentatively Selected Plan.

Response: NYCEDC is working closely with USACE, including the HATS team. The FiDi FORGE project is independent of HATS, but builds off overlapping work, and, as a part of the Section 203 process, the USACE is the lead agency for NEPA and will ultimately submit the project for Assistant Secretary of the Army (Civil Works) and Congressional approval.

11.5 Transportation Considerations

Comment 4-1: Will Blueline Highway or any maritime freight dock and transloading facility be incorporated and/or served under the alternatives considered? Changes in infrastructure should be analyzed as whether they are financially cost effective and how to minimize the demolition of already-planned infrastructure.

Response: NYCEDC is coordinating the FiDi FORGE project with the Blue Highways initiative and the planning for FiDi FORGE will not preclude opportunities for Blue Highways to operate on the waterfront.

Comment 4-2: The project seems to not be connected to the community its serving. If the waterfront area is to be restored, the connectivity of the street grids to waterborne transportation should also be considered.

Response: The purpose of FiDi FORGE Section 203 study is to manage coastal storm risk in the FiDi-Seaport neighborhood, while maintaining universal pedestrian and vehicular access to and from the waterfront. The evaluation of alternatives and assessment of the environmental effects in the Integrated Interim Report will consider all the resources present and potentially affected within the study area, including waterfront access. Maintaining waterborne transportation, as well as connections to subways, buses, and pedestrian circulation is a major consideration in the project constraints.

Comment 4-3: The new ferry terminal must enhance ferry service to and from Staten Island and make sure it continues to be robust into the future. Will it be adequate for increasing demand of Staten Island, Governors Island, and possibly screening for Liberty and Ellis Islands?

Response: The proposed new Whitehall Ferry Terminal will be designed to accommodate increasing levels of service based on estimated ridership growth projections received from NYC Department of Transportation and the Trust for Governors Island during the FiDi and Seaport Climate Resilience Plan process. The future terminal is also designed to include an additional slip compared to the current facility to provide sufficient dwell time for vessel recharge given demand forecast and expected electrification. Screening for Liberty and Ellis Island tours is outside the scope of this study. NYCEDC will continue to coordinate with its maritime infrastructure stakeholders to ensure accurate projections throughout the design process.

Comment 4-4: The Integrated Interim Report should include a (phase-by-phase) mitigation plan showing how ferry, subway, pedestrian, bicycle, other vehicles, and emergency access will be maintained throughout construction.

Response: Maintaining multimodal transportation and emergency access during construction are key factors identified in the study. The Integrated Interim Report will include information on construction phasing in engineering and cost engineering appendices, and analyze potential construction effects, as applicable, by resource, identifying best management practices to minimize the effects as applicable.

Comment 4-5: Please provide more details regarding the existing maritime uses within the study area and which uses can be preserved. We support the use of the waterfront for maritime uses to integrate resilience.

Response: The Integrated Interim Report will characterize the existing maritime uses within the study area and evaluate the potential for the proposed activities to affect these resources as part of the environmental analysis.

Comment 4-6: The report should evaluate how maritime assets within the project area can support emergency response, evacuation, recovery operations, and continuity of transportation services following extreme weather events.

Response: The Integrated Interim Report will characterize the existing maritime uses within the study area, including that of accommodating emergency response capabilities. Maintaining these capabilities is a constraint of the study, and alternatives will be evaluated in part based on maintaining emergency response, evacuations, recovery operations, transportation services, and resilience. A full discussion of emergency access will be included in the plan formulation chapter and engineering appendix.

Comment 4-7: The EIS should fully describe the transportation modifications that would occur under each alternative.

Response: The Integrated Interim Report will include a discussion of the transportation infrastructure and methods that exist within the study area. Alternatives will be evaluated with respect to these resources and conditions.

Comment 4-8: What is the strategy for analyzing transportation improvements and benefits for each alternative? Any resilience plan for this area must enhance transportation access to and from Lower Manhattan for all modes of transit, including ferry, subway, bus, bicycle, and pedestrians.

Response: The purpose of FiDi FORGE Section 203 study is to manage coastal storm risk in the FiDi-Seaport neighborhood, while maintaining universal pedestrian and vehicular access to and from the waterfront. The evaluation of alternatives and assessment of the environmental effects in the Integrated Interim Report will consider all the resources present and potentially affected within the study area. Maintaining public accessibility and open space features are part of the study objectives. The transportation analysis will consider transit, ferry, subway, bus, bicycle, pedestrian, and other human-powered transportation.

Comment 4-9: The Integrated Interim Report should include an operating-performance analysis for ferries, subways, buses, roads, pedestrians, bicycles, freight, emergency vehicles, and maritime services. The analysis should disclose current and future service, passenger and freight volumes, berth and terminal capacity, accessible routes, transfer patterns, and network dependencies. Alternatives should be compared using measures such as passenger throughput, berth availability, accessible transfer time, street and greenway continuity, service-interruption duration, emergency and evacuation capacity, and time to restore operation.

Response: Detailed descriptions of operational capabilities and inventories of the transportation systems will be used to compare alternatives for measures such as ferry passenger throughput, ferry berth availability, transfer time from ferries to subways or buses, street and greenway continuity, ferry service interruption duration, emergency and evacuation capability, and time to restore ferry operations post-construction. Those quantitative descriptions will provide the basis for scoring each alternative using the metrics methodology as part of the EIS. Each alternative will be assessed using a scale of disruption and potential adverse effects, ranging from none to moderate.

Comment 4-10: The project should not encourage helicopter use along the East River and should monitor helicopter abuse of the downtown heliport.

Response: FiDi FORGE is intended to manage coastal storm risk while maintaining existing uses and features within the study area. The study does not include changes to helicopter operations or oversight of heliport activity. The Integrated Interim Report will evaluate relevant construction and operational effects, including air quality and noise, as appropriate.

11.6 Social and Environmental Considerations

11.6.1 Air Quality, Noise, and Vibration

Comment 5-1: The effects of the project, including noise, vibration, air quality, and solid waste should be considered in this environmental review as well as mitigation including monitoring, air filters and dust suppression measures to protect the residential populations in this area. Public health impacts of lower air quality due to construction and stationary sources of pollution should also be described.

Response: The Integrated Interim Report will evaluate the potential for the proposed activities to result in noise, vibration, and air quality effects within the study area during construction and operation and identify measures and plans such as best construction management practices to minimize these effects. Public health will not be specifically addressed in this NEPA-level analysis but public health considerations may be addressed through related resource areas, including air quality and noise, depending on the results of the analyses.

Comment 5-2: The City should analyze the impacts on air quality during project construction (i.e. simultaneous operation of heavy machinery, combustion engines, and demolition). Given the proximity of the construction to sensitive receptors, including nearby schools and hospitals, and the extent of the construction timeframe, NYCEDC should evaluate strategies to measure and mitigate exposures during project implementation. As New York City is in a nonattainment or maintenance area for several criteria pollutants, EPA supports the intention to analyze air quality impacts and suggests discussing the applicability of general conformity in the EIS.

Response: Emissions from Federal actions are regulated under 40 CFR §93 Subpart B General Conformity. As described in the Notice of Intent: EIS Scoping Additional Information Document, the proposed activities' potential to affect air quality will be evaluated in accordance with the Clean Air Act. This analysis will use anticipated emissions to determine if the project meets General Conformity thresholds and conform with the State Implementation Plan. Mitigation will identified and documented if required based on the emissions evaluation.

11.6.2 Visual Resources

Comment 5-3: If new buildings are authorized as part of the project, their heights should be regulated and restricted to allow for more spaciousness for humans.

Response: Visual resources are addressed in the Integrated Report and included as part of the socioeconomics and neighborhood character analysis. While any new structures would be evaluated as part of the analysis and would be disclosed if affecting the viewsheds within the study area, new structures and their heights would be constructed per City zoning requirements. As design progresses, the project will be analyzed for compliance with zoning and any other local approvals necessary.

Comment 5-4: How will iconic views, visual corridors, and character-defining elements of the landscape be identified to protect visual resources?

Response: Visual resources effects of the proposed alternatives will be considered as part of the social conditions and evaluated as part of the EIS. Information will include representative views of the proposed conditions of each alternative compared to the No Action.

11.6.3 Water Resources and Water Quality

Comment 5-5: Provide more information on the impact of induced flooding on other unprotected and/or previously unaffected communities.

Response: The interior drainage sub-appendix of the Integrated Interim Report will provide an overview of induced flooding effects. Following USACE policy, the Tentatively Selected Plan must not increase flood risk in previously unaffected communities.

Comment 5-6: A robust alternatives analysis should be developed which shows that impacts to waters of the United States, including wetlands, streams, and other aquatic resources, be avoided and minimized to the maximum extent practicable.

Response: The Integrated Interim Report will describe the process for evaluating alternatives to avoid and minimize adverse effects to waters of the US and the state, including wetlands; assess the potential for construction and operation of the proposed actions to affect aquatic resources; and identify mitigation measures to minimize these effects.

11.6.4 Aquatic Habitat and Wildlife

Comment 5-7: The analysis of aquatic habitat and biota should include more than a 1-year study and consider historic studies on the migratory patterns of present species.

Response: The Integrated Interim Report will characterize aquatic habitat and biota within the study area in the East River based on the results from the three years of sampling conducted by NYCEDC for the project, and other existing sources of information. The Report will assess the potential for the proposed activities to result in direct and indirect effects to these resources during construction and operation, including the potential to affect fish migration.

Comment 5-8: We are concerned about the effects on critical marine habitats based on the amount of fill that would destroy habitat, narrowing of the channel that could accelerate current speeds, and increase of shoreline erosion which could threaten high-biodiversity zone and reef-building benthic species and affect fish migration. Striped bass migration and breeding areas are also at risk because of existing maritime traffic and infrastructure as are other aquatic organisms including endangered Atlantic and shortnose sturgeon.

Response: The Integrated Interim Report will characterize aquatic habitat and biota within the study area in the East River based on the results from the three years of sampling conducted by NYCEDC for the project, and other existing sources of information. The environmental analysis in the Integrated Interim Report will include the potential for the proposed activities to result in direct and indirect effects to these resources during construction and operation, including the potential to affect fish migration, endangered Atlantic and shortnose sturgeon, and other species known to use the lower East River such as striped bass, and identify mitigation measures to minimize these effects.

Comment 5-9: Provide details about the methods of in-water construction and the anticipated impacts on aquatic habitat, migratory fish, benthic communities, water quality, stormwater management and shoreline resources including fill and overwater coverage. The EIS should identify the volume of fill, location of fill, and the resulting loss or alteration of aquatic habitat for each alternative.

Response: The Integrated Interim Report will include an engineering appendix which will detail the methods for in-water construction. The potential for these construction means and methods to result in short-term effects to aquatic biota due to increases in underwater noise, suspended sediment, and increased vessel movement, and to water quality will be assessed in the Integrated Interim Report, along with long-term effects to these same resources due to placement of fill and any increases in overwater coverage resulting from the proposed actions. Effects associated with each alternative, and mitigation measures to minimize these effects, will be presented.

Comment 5-10: The EIS must evaluate mitigation measures associated with any proposed fill. Any mitigation analysis should be informed by the ongoing biological and habitat sampling program. That data must be made publicly available and used to evaluate and compare the alternatives. In addition, the EIS must explain how unavoidable habitat losses would be mitigated, whether compensatory habitat restoration is proposed, and how the proposed mitigation would achieve no net loss of aquatic functions and values. If compensatory habitat restoration is proposed, the EIS must identify potential restoration sites within New York City.

Response: The Integrated Interim Report will characterize aquatic habitat and biota within the study area in the East River as part of the environmental analysis and based on the results from the three years of sampling conducted by NYCEDC for the project which will be included in the Report, and other existing sources of information. The Report will assess the potential for the proposed actions to result in direct and indirect effects to these resources during construction and operation, including the potential to affect fish migration, endangered Atlantic and shortnose sturgeon, and other species known to use the lower East River. Effects associated with each alternative will be identified, and measures to mitigate placement of fill and increased overwater coverage developed in coordination with state and federal resource agencies will be presented.

Comment 5-11: Any habitat restoration or mitigation commitment should specifically address the extent to which in-water construction, including pile driving and dredging, may affect sturgeon presence and movement in the lower East River, and should be informed by and coordinated with the results of the three-year biological and habitat sampling conducted. The potential for compensatory habitat restoration to occur within the bounds of the project site as part of incorporating nature-based features should be evaluated.

Response: The Integrated Interim Report will include an engineering appendix which will detail the methods for in-water construction. The potential for these construction means and methods to result in short-term effects to aquatic biota, as characterized by the three years of aquatic sampling, due to increases in underwater noise, suspended sediment, and increased vessel movement, and to water quality will be assessed in the Integrated Interim Report, along with long-term effects to these same resources due to placement of fill and any increases in overwater coverage resulting from the proposed actions. Effects associated with each alternative will be identified, and measures to mitigate for the placement of fill

and increased overwater coverage developed in coordination with state and federal resource agencies will be presented.

Comment 5-12: This project should not be viewed in isolation. Any unavoidable impacts to the Hudson River and East River resulting from the FiDi Forge project should be accompanied by a clear commitment from USACE and NYCEDC to advance beneficial habitat restoration and resilience projects elsewhere within the NY-NJ HATS study area. Because this project is one component of a broader regional coastal resilience strategy, mitigation commitments should likewise extend beyond Lower Manhattan and include restoration opportunities throughout the HATS project area.

Response: Mitigation proposed as part of the Integrated Interim Report will be associated with the effects of the proposed activities. Mitigation activities will be determined in coordination with the relevant resource agencies and will follow the USACE guidelines associated with the siting and amount of mitigation required based on the analysis of potential effects.

Comment 5-13: The analysis should identify opportunities for habitat restoration, expanded biodiversity, or ecological enhancement

Response: Opportunities for inclusion of ecological enhancement of terrestrial and aquatic habitats will be considered and evaluated for each alternative and included in the Interim Integrated Report.

Comment 5-14: The project area, including the East and Hudson Rivers are designated as essential fish habitat (EFH) for federally managed species under the Magnuson-Stevens Fishery Conservation and Management Act (MSA). The rivers also provide habitat for a wide variety of aquatic species such as diadromous fishes and shellfish we seek to conserve and enhance under the Fish and Wildlife Coordination Act (FWCA). Under the FWCA, federal agencies are required to consult with the National Oceanic and Atmospheric Administration (NOAA) to conserve wildlife resources by preventing their loss or/and damage, as well as providing for the development and improvement of those resources. Federally-listed resources under the Endangered Species Act (ESA) may also be present in the study area.

Response: These resources will be evaluated as part of the environmental analysis in the EIS portion of the Integrated Interim Report, and NYCEDC and USACE will continue to coordinate with NOAA.

11.6.5 Maritime Infrastructure and Navigation

Comment 5-15: The effects of the alternatives on navigation should be assessed through hydrological studies; features such as current intensity should be considered.

Response: The Integrated Interim Report includes a 3D hydrodynamic model of the East River which will evaluate the effects of the coastal storm risk management measures, new waterfront structures, and ferry terminals on the current in the East River.

Comment 5-16: Maritime operations should be maintained along coast during construction of the resulting project. Infrastructure should remain open during the anticipated 10-year

construction timeline to avoid disruption to critical services. Include phasing strategies and costs associated with construction in the study.

Response: Maintaining maritime operations along the FiDi/Seaport coastline is critical and part of the study's purpose and need. The Integrated Interim Report will disclose anticipated construction phasing as well as strategies to maintain maritime operations during construction. These strategies will be included in the cost engineering appendix and evaluated in the Report.

Comment 5-17: The EIS should also address how each alternative accounts for future growth in maritime operations, given anticipated increases in ridership and population in Lower Manhattan.

Response: The Integrated Interim Report will include an EIS level analysis that will consider the current and forecasted maritime operations based on readily available studies and data.

Comment 5-18: The EIS should include an analysis of navigation with regards to ferry impacts and emergency maritime access.

Response: The Integrated Interim Report will include an EIS level analysis that considers ferry traffic as well as emergency vessel access.

Comment 5-19: The study should include a maritime use plan for the waterfront and how this area will remain a working, historic, recreational, educational waterfront. This should include details about where maritime public amenities and programs will be preserved or expanded.

Response: The purpose of FiDi FORGE Section 203 study is to manage coastal storm risk in the FiDi-Seaport neighborhood, while maintaining the existing uses and features within the study area. This includes maintaining the current level of service for the maritime assets in the study area.

11.6.6 Socioeconomics

Comment 5-20: Southbridge Towers as well as the Smith Houses (just north of the Brooklyn Bridge) should be evaluated and included as part of the study area, as they are older, residential complexes close enough to the study area to have the potential to be affected by the project.

Response: Southbridge Towers and the Smith Houses are outside the study area as well as outside the indirect study area identified for the various resource categories evaluated in this study. Proposed alternatives evaluated in the Integrated Interim Report would not directly displace any residential population within or outside of the study area. The socioeconomic analysis will document existing residential, business, employment, community facility, and neighborhood conditions within the study area and evaluate the potential direct and indirect effects of the alternatives on those resources. The assessment will consider potential socioeconomic effects such as changes in population or housing demand, effects on businesses and employment, community facilities and services, neighborhood character and viewsheds, community cohesion, and other community effects associated with construction and operation of the proposed activities.

Comment 5-21: The socioeconomic analysis should include a description of how "displacement" will be analyzed (e.g., direct or indirect displacement) as well as impacts on low-income neighbors and other vulnerable populations (e.g., NYCHA residents at the nearby Alfred E. Smith Houses).

Response: The proposed alternatives would not directly displace any residential population within the study area. The socioeconomic analysis will document existing residential, business, employment, community facility, and neighborhood conditions within the study area and evaluate the potential direct and indirect effects of the alternatives on those resources. The assessment will consider potential socioeconomic effects such as changes in population or housing demand, effects on businesses and employment, community facilities and services, neighborhood character and viewsheds, community cohesion, and other community effects associated with construction and operation of the proposed activities.

11.6.7 Recreation, Parkland, Open Space, Public Access

Comment 5-22: The Integrated Interim Report should analyze public waterfront access points and public open spaces. Mitigation plans must be explored to provide public access to the waterfront during construction, including the phasing of open space closures and the protection of mature trees where possible.

Response: The Integrated Interim Report will evaluate potential effects to public open space and access to the waterfront during and after construction and will identify measures to minimize these effects as part of the EIS-level analysis.

Comment 5-23: The study should include a plan for use of the waterfront, the public use facilities planned, and the funding path.

Response: The purpose of FiDi FORGE Section 203 study is to manage coastal storm risk in the FiDi-Seaport neighborhood, while maintaining pedestrian and vehicular access to and from the waterfront. Maintaining public accessibility and open space features associated with the waterfront are part of the study objectives. While cost, size, and specific uses may not yet be determined at the time of the Draft Integrated Interim Report's publication, discussion will include the information known at the time of the analysis and will be evaluated for each alternative considered. The City is exploring different funding mechanisms to support the project.

Comment 5-24: Study the Brooklyn Bridge shoreline as a public open-space opportunity. The EIS should study whether a public access amenity can be created safely, while also helping close the gap between FiDi-Seaport and Brooklyn Bridge-Montgomery coastal resilience.

Response: The potential for the project to result in indirect effects to the resources along the Brooklyn Bridge Shoreline will be evaluated in the Integrated Interim Report. Development of this portion of the shoreline for public open space is outside the scope of the study.

Comment 5-25: Pedestrian, cycling, and other human powered transportation should be seamless between the project and other parts of lower Manhattan.

Response: Part of the project's purpose and need is to maintain the existing pedestrian, cycling, and other human powered transportation corridors throughout the study area. The Integrated

Interim Report will evaluate potential construction and operational effects of proposed activities on pedestrian, cycling and human powered transportation corridors of lower Manhattan and identify measures to reduce these adverse effects.

Comment 5-26: The project should incorporate public amenities, such as well-maintained bathrooms at ferry terminals and city buildings.

Response: The Integrated Interim Report will describe the public amenities that would result from each alternative, including the assumption that these amenities would be constructed and maintained in accordance with City specifications and requirements.

Comment 5-27: The stretch from Staten Island Ferry up to Pier 11 is in poor shape.

Response: The study area includes this portion of the waterfront. The Integrated Interim Report will evaluate three different alternatives for rebuilding and integrating public access and coastal storm risk management for this stretch of waterfront.

Comment 5-28: The project should maintain clear access to the waterfront and preserve the historic feel of the seaport.

Response: The purpose of FiDi FORGE Section 203 study is to manage coastal storm risk in the FiDi-Seaport neighborhood, while maintaining universal pedestrian and vehicular access to and from the waterfront. The evaluation of alternatives and assessment of the environmental effects in the Integrated Interim Report will consider all the resources present and potentially affected within the study area, including neighborhood character. Maintaining public accessibility, open space features, and the protection of community assets, including historic properties, are part of the study objectives.

Comment 5-29: Any expansion of the East River Esplanade should integrate green infrastructure for stormwater management and tree plantings for shade during extreme heat days. Similarly, landscape areas of the waterfront park should maximize green landscaping options. We would not support a pedestrian esplanade that is largely designed with impervious surface and limited shading options. The project should maintain safe and accessible waterfront connections wherever feasible and to clearly describe how public access, ferry services, bicycle routes, and pedestrian circulation will operate before, during, and after storm events.

Response: The purpose of FiDi FORGE Section 203 study is to manage coastal storm risk in the FiDi-Seaport neighborhood, while maintaining universal pedestrian and vehicular access to and from the waterfront. The evaluation of alternatives and assessment of the environmental effects in the Integrated Interim Report will consider all the resources present and potentially affected within the study area. The feasibility study will evaluate which alternatives have opportunities to integrate nature-based enhancements to address interior drainage and extreme heat. Public waterfront access is being evaluated as part of the EIS and economics chapter of the Integrated Interim Report.

Comment 5-30: The EIS should analyze how each of the alternatives will improve access to new and/or improved recreation, parklands, and open space.

Response: The EIS will identify all existing park, recreational resources, and open space available for public use as well as the potential effects of the alternatives on these resources. The EIS

will also disclose if new areas would be developed for these uses and their anticipated effect/benefit.

11.6.8 General

Comment 5-31: The study should include a discussion of public benefits such as new open space, flood protection, community programming, and equitable access to these benefits.

Response: The alternatives will be evaluated using USACE comprehensive benefits framework, which includes the four USACE accounts: National Economic Development (NED), Regional Economic Development (RED), Other Social Effects (OSE), and Environmental Quality (EQ). OSE considers how an alternative affects people and communities in ways that are not monetized, like safety, recreation, and quality of life. The alternative that maximizes the total net benefits across all four categories will be selected as the Tentatively Selected Plan. These results will be detailed in the economics appendix of Integrated Interim Report.

Comment 5-32: The EIS should analyze any adverse impacts of each alternative on existing infrastructure, public resources, and communities, but also the benefits that each approach would deliver to identify the alternative that best delivers on the Master Plan's three goals: (1) protect Lower Manhattan from tidal flooding and coastal storms (2) integrate climate resilience infrastructure into the city (3) enhance the public waterfront by creating open spaces.

Response: The EIS will identify the potential adverse effects as well as benefits of each alternative for all resources present within the study area. These benefits will be compared to the purpose of the Integrated Interim Report and its goals and objectives. Comparison to the previous master planning effort will not be conducted as part of this analysis.

Comment 5-33: The study should establish a long-term monitoring framework with publicly available performance measures for flood protection, ecological conditions, infrastructure performance (including CSO discharges, public access, and public use).

Response: The Integrated Interim Report will identify the need for and the possible long-term monitoring and adaptive management measures as appropriate for each resource area.

Comment 5-34: The EIS should include a consolidated analysis of cumulative construction impacts on neighborhoods, businesses, schools, transportation systems, cultural institutions, public health, and waterfront access, together with clear mitigation measures that minimize disruption throughout the construction period.

Response: The effects analysis included in the EIS includes an assessment of direct, indirect, temporary, and permanent effects, including detailed evaluations of construction activities for each resource potentially affected.

11.7 Governance and Permitting Considerations

Comment 6-1: This project is important with respect to federal funding cuts associated with FEMA and supporting communities affected by extreme weather events as well as the difficulty of individuals obtaining insurance coverage in this area.

Response: The City is continuing to work on addressing federal funding cuts and insurance affordability, in parallel to advancing critical infrastructure projects, like FiDi FORGE.

Comment 6-2: Analysis should consider the responsible parties for maintenance and operation of any new spaces/facilities created.

Response: The Integrated Interim Report will identify responsible parties for those alternatives that implement facilities or infrastructure that requires maintenance or management.

Comment 6-3: All project parties should lend support to the Bureau of Coastal Resilience and the U.S. Army Corps of Engineers for advancing more projects like these.

Response: The NYCEDC continues to partner with the USACE to try and advance coastal protection throughout the HATS project area. City agencies are coordinating with the Bureau of Coastal Resilience on advancing citywide resiliency efforts.

Comment 6-4: The City should identify other City funding sources and grants for continued planning and implementation of FiDi FORGE as well as the funding of its eventual operation and maintenance.

Response: The NYCEDC advocated for funding to ensure the successful completion of the Integrated Interim Report and will continue to advocate for necessary design, permitting, construction, and eventual operations and maintenance funding for the FiDi FORGE project.

Comment 6-5: Please identify what other resources you are tapping into so as not to take money away from other areas across the city, resulting in inequitable funding allocations. How will the City's funding commitments to this project affect the City's ability to address other vulnerable neighborhoods?

Response: The City is undergoing this Section 203 Feasibility Study in partnership with USACE with the goal of securing a federal funding match for the project. Additionally, NYCEDC is a close partner of the Bureau of Coastal Resiliency, who is tasked with advancing citywide resiliency efforts with a focus on equity. The City convened a Resilience Finance Task Force in 2024 to identify additional funding opportunities for resilience projects citywide.

Comment 6-6: The Integrated Interim Plan should include an asset-responsibility matrix identifying the owner, operator, maintainer, emergency decision-maker, and funding source for each floodwall, gate, pump, conveyance element, outfall, ferry facility, public space, and project tie-in. This information should include activation thresholds, command and communications protocols, inspection and testing requirements, backup-power arrangements, replacement schedules, and the process for modifying interfaces as adjoining projects or climate conditions change.

Response: Information related to operation of coastal storm risk management measures for the Recommended Plan will be included in the operations, maintenance, repair, replacement, and rehabilitation section of the Final Integrated Interim Report. Future adaptability will be addressed in the Integrated Interim Report as part of the engineering appendix. Funding sources for each element of the alternatives will not be evaluated as part of the Integrated Interim Report following the Section 203 process.

Comment 6-7: The project should not use private money on public land.

Response: The City is undergoing this Section 203 Feasibility Study in partnership with USACE with the goal of securing a federal funding match for the project. The City is exploring different funding mechanisms to support the project.

11.8 Public and Agency Involvement Considerations

Comment 7-1: What other information is publicly available about project alternatives and criteria used in the analysis?

Response: The EIS Scoping Additional Information Document, EIS scoping public meeting slides, and informational boards from the scoping meeting, as well as the recordings of those meetings are posted on the NYCEDC website at the following link: https://fidiseaportclimate.nyc/environmental-review. The plan formulation process follows USACE guidance for evaluating structural, non-structural, and nature-based solutions approaches and alternatives.

Comment 7-2: The Battery to Bridges Coalition and others should be engaged for this project and be given a "seat at the table" to comment on major design decisions. There has also been a significant amount of engagement resulting from the FiDi Seaport Master Plan. Ongoing meaningful engagement with the community is essential.

Response: FiDi FORGE builds off the extensive community engagement conducted during the FiDi and Seaport Climate Resilience Plan process, which included 10 public workshops, more than 1,500 newsletters distributed, more than 1,500 visitors to a 2025 exhibit in the Seaport, and additional tabling events and engagement with community organizations and stakeholders. Engagement to date is summarized on the NYCEDC website at the following link: https://fidiseaportclimate.nyc/engagement.

Public engagement is continuing as part of FiDi FORGE in accordance with the National Environmental Policy Act. Three public scoping meetings were held during the scoping period, both in-person and virtually, welcoming input on the scope of the study, which will be reflected in the Draft and Final Integrated Interim Reports. All comments received during the EIS scoping period are responded to in this document.

There will be another opportunity for agencies and members of the public to participate and provide feedback on FiDi FORGE when the Draft Integrated Interim Report is published in spring 2027.

Comment 7-3: How does this stage of NEPA analysis relate to State and City environmental requirements? Will these analyses be done sequentially or are concurrently?

Response: The environmental review incorporated into the Integrated Interim Report evaluates a federal action and is intended to meet National Environmental Policy Act (NEPA) requirements. State Environmental Quality Review Act (SEQR) and City Environmental Quality Review (CEQR) processes, if required for later State or City discretionary actions, are anticipated to occur following completion of the NEPA process. The responsible agencies will determine the applicable process and sequencing.

Comment 7-4: Please describe the outreach efforts made to Staten Island residents, as this project will affect the Staten Island Ferry, which is a critical connection for its residents.

Response: Outreach during scoping included engagement with identified stakeholders and project information displayed at the Whitehall Ferry Terminal during the Seaport Climate Resilience Plan process. Future engagement will continue to seek input from ferry users, Staten Island stakeholders, and other interested parties. Section 9 of the report summarizes public and agency outreach activities.

Comment 7-5: The EIS scoping document lacks sufficient information to support full and fair public comment regarding the project's alternatives, criteria, methodology, and assumptions used to analyze the alternatives. This includes the cost effectiveness differences between each alternative The public should be able to review the knowledge that was used to choose/screen out alternatives, as well as the extent, nature, and sufficiency of the project sponsor's specific plans for evaluating environmental impacts.

Response: The purpose of the EIS Scoping Additional Information document was to introduce the study, alternatives to be analyzed, and the anticipated resource issues of concern. The information requested in the comment is all under development and will be disclosed and available for public review in the Integrated Interim Report. The draft of this Report will be available for public review and comment.

Comment 7-6: This engagement process must be combined with the formation and long-term continuation of an NYNJHATS community engagement group or process throughout the span of project planning, design, and implementation.

Response: The FiDi FORGE is a separate initiative from NYNJHATS and has its own feasibility study and NEPA engagement process. The project team will continue engagement focused on the FiDi FORGE study area and will coordinate with related resilience-planning efforts, as appropriate. A robust engagement process was also conducted as a part of the Seaport Climate Resilience Plan.

Comment 7-7: Please post the slide presentation and informational boards from the public scoping meetings to the website.

Response: The slides and boards from the scoping meeting, as well as the recordings, are posted on the NYCEDC website at the following link: https://fidiseaportclimate.nyc/environmental-review. The scoping presentation and informational boards are also included as attachments to this report (**Attachments A** and **B**).

Comment 7-8: Section 203 should allow for a more flexible community engagement process than a traditional USACE process. NYCEDC should leverage New York City's community engagement strategies, including building on successful prior engagement strategies like the "Resilience+" workshops hosted across the Financial District and Seaport neighborhoods. The opportunity for feedback for the Integrated Interim Report did not provide sufficient information about the project alternatives, which hindered the ability to offer substantive feedback. We hope for the opportunity to stay engaged and in communication through more informal channels.

Response: The project team recognizes the request for continued, accessible opportunities for public engagement. Engagement conducted to date and planned opportunities for future input are described in the responses to Comments 7-2 and 7-5. Information on alternatives will

be made available as the study advances, consistent with the feasibility-study and NEPA process.

11.9 Other

Comment 8-1: Commenters expressed support in the effort to protect waterfronts as part of a larger resiliency campaign for Manhattan but that the scope of the environmental review should be such that impacts to residents, students and workers within the study area are evaluated and mitigated.

Response: The Integrated Interim Report will analyze potential effects to residents, workers and visitors within the study area as part of the evaluation of potential effects to numerous resource areas such as noise and vibration, open space, transportation, land use, socioeconomics and neighborhood character and visual resources.

Comment 8-2: How will the Seaport Coastal Resilience Project be incorporated into the Integrated Interim Feasibility Report?

Response: FiDi FORGE is the larger, comprehensive plan for managing coastal storm risk in Lower Manhattan's Financial District and Seaport neighborhoods, while the Seaport Coastal Resilience Project (SPCR) as currently proposed is a separate near-term project focused specifically on the Seaport area between John Street and the Brooklyn Bridge, designed to raise the waterfront in this area to 11 feet elevation to address current and future tidal flooding in one of the lowest-lying portions of Lower Manhattan. FiDi FORGE has a longer time horizon for completion, while the Seaport Coastal Resilience Plan is planned for providing more immediate protection of the neighborhood's most vulnerable areas. Following USACE policy, Seaport Coastal Resilience will not be included in the Integrated Interim Report, because the project has not received approval at this time.

Comment 8-3: NYCEDC should disclose interim steps to provide protection and public space amenities prior to the implementation of this project.

Response: The Integrated Interim Report will identify other City waterfront initiatives that are relevant to the study area, as appropriate. Information on ongoing Lower Manhattan resilience initiatives is also found on the City's website: https://www.nyc.gov/site/lmcr/progress/progress.page.

Comment 8-4: Project should address the uncompleted building at 161 Maiden Lane, which has been known to leaning since 2019. This should be resolved before FiDi FORGE construction begins.

Response: Conditions at 161 Maiden Lane are outside the scope of the FiDi FORGE study. The Integrated Interim Report will evaluate potential project-related effects within the defined study area.

Comment 8-5: Commenters expressed that the FiDi FORGE project is a critical part of finishing the coastal resilience protections in this area.

Response: Thank you for your comment and support.

Comment 8-6: This project lacks protection for other communities in New York City. The proposed cost of protection and waterfront amenities considered in the alternatives is inequitable in view of the relative absence of such amenities from waterfront areas in state- and federally-identified disadvantaged communities throughout the City such as East Harlem, Port Morris, Mott Haven and others. The City should implement a final NYNJHATS plan that centers the needs of low-income, disadvantaged communities, along with a robust and fair public engagement strategy that prioritizes engagement with disadvantaged communities. EDC and the USACE should cultivate the potential of areas like East Harlem, which is the only Manhattan community lacking connection to the recreational "greenway" at the periphery of the island, or Port Morris and Mott Haven, whose community-developed Waterfront Access Plan remains almost completely unfunded and unbuilt, nearly 15 years after that plan was first proposed. This engagement process must be combined with the formation and long-term continuation of an NYNJHATS community engagement group or process throughout the span of project planning, design, and implementation.

Response: The FiDi FORGE is a separate initiative from NYNJHATS, and this engagement process is associated with the ongoing Feasibility Study and NEPA environmental review of proposed activities. FiDi FORGE is being advanced as a Section 203 process in partnership between the City and USACE. NYCEDC is a close partner of the NYC Department of Environmental Protection Bureau of Coastal Resiliency, who's tasked with advancing citywide resiliency efforts with a focus on equity.

Comment 8-7: The FiDi FORGE project should pursue Waterfront Edge Design Guidelines (WEDG) verification and utilize WEDG Standards for Resilience, Ecology, and Public Waterfront Access Goals. WEDG categories include Site Assessment & Planning, Climate and Hazard Resilience, Community Access & Connections, Edge Composition, Natural Resources and Sustainability, and Innovation. WEDG is designed to shape waterfronts that include features that will be welcomed by the community, while also providing resilient infrastructure and enhancing the ecological value of the site. Neighboring projects like ESCR and South Battery Park City Resiliency are both designed to adhere to WEDG standards.

Response: WEDG was evaluated for this project and incorporated where appropriate, balanced with the constraints of the active maritime uses on the waterfront.

Comment 8-8: The project team is coordinating with other Lower Manhattan climate-resilience project teams to identify relevant lessons learned and community priorities from prior environmental review processes (e.g., East Side Coastal Resiliency project, Battery Park City Resiliency project). Relevant publicly available information will be considered, as appropriate, in the FiDi FORGE analysis.

Response: The City acknowledges these concerns and priorities and are in close coordination with the other Lower Manhattan Climate Resiliency project teams regarding lessons learned and community priorities from their EIS processes. Relevant information from published environmental reviews will be incorporated as appropriate.

Comment 8-9: This project will complement other resiliency investments throughout Lower Manhattan and help close remaining gaps in the city's coastal flood protection network. Given the scale of infrastructure work necessary to protect this nationally historically and economically

significant geography for the nation's future prosperity, it is imperative that planning, environmental review, funding, and implementation continue without unnecessary delay.

Response: The comment regarding the importance of coordinated planning, environmental review, funding, and implementation has been noted. The anticipated study schedule is available on the project environmental review webpage. https://fidiseaportclimate.nyc/environmental-review.

Comment 8-10: Some of the records at the NYC Municipal Archives and Library might be useful to the impact study. https://www.archives.nyc/blog/2026/3/20/at-the-rivers-edge-maiden-lane-and-the-development-of-lowermanhattan

Response: Thank you for sharing this resource. The project team will review the referenced Municipal Archives resource to determine its relevance to the study's cultural resources and historical-context analyses.

Attachment A
Scoping Presentation


Photo Credit: Matteo Colombo

FiDi and Seaport

Fortifying Our Resilient Growth & Economy

FiDi FORGE
National Environmental Policy Act (NEPA) Scoping Meeting

June 25, 2026

NYC EDC

US Army Corps of Engineers

Agenda

1. Introductions
2. Study Background
3. Section 203 Feasibility Study & Water Resources Development Act (WRDA)
4. The National Environmental Policy Act (NEPA) Process
5. Study Purpose and Objectives
6. Project Alternatives
7. Scope of EIS Analysis
8. Next Steps & Near-Term Schedule
9. Opportunities for Public and Agency Review/Submission of Comments

Introductions

Federal Government

US Army Corps of Engineers®

NYC Government

NYC EDC

NYC Environmental Protection

NYC Mayor's Office of Climate & Environmental Justice

NYC Small Business Services

Consultant Team

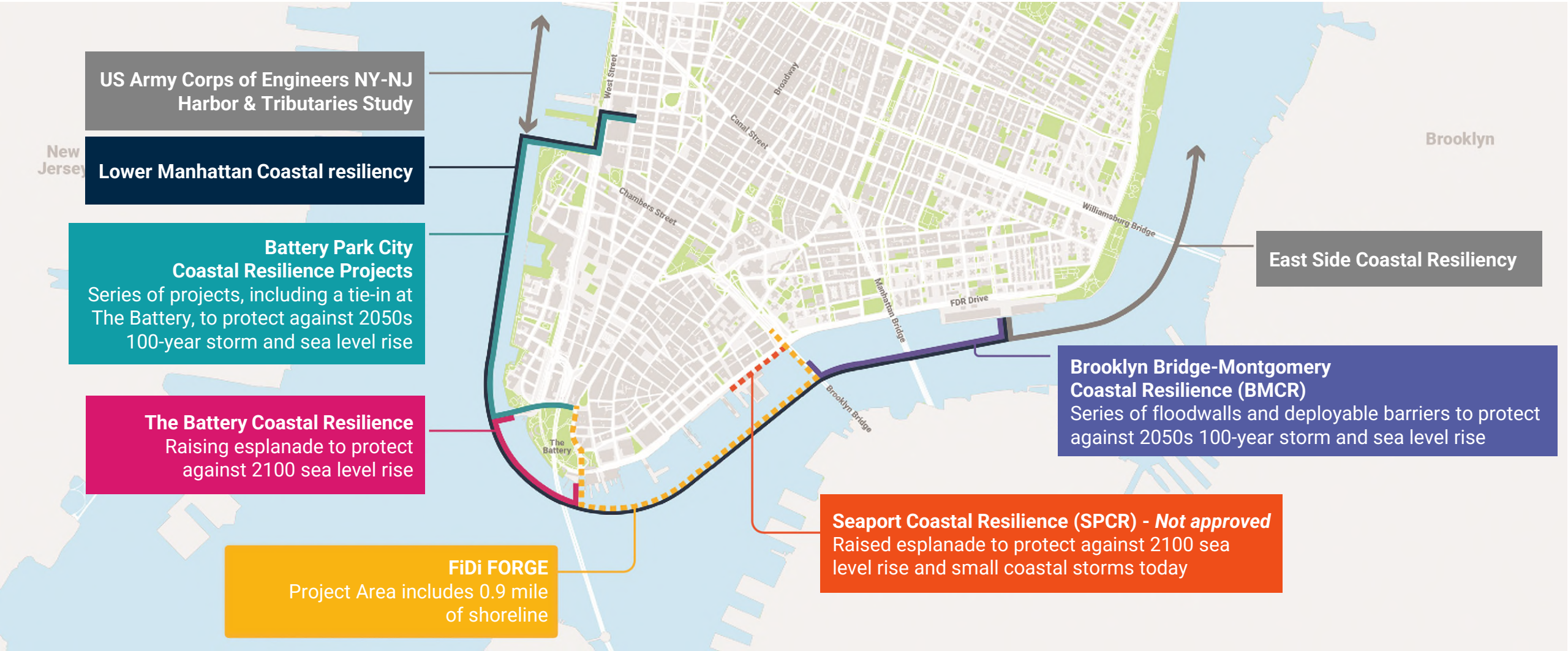
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J&A

Study Background

Study Context



US Army Corps of Engineers NY-NJ Harbor & Tributaries Study

Lower Manhattan Coastal resiliency

Battery Park City Coastal Resilience Projects
Series of projects, including a tie-in at The Battery, to protect against 2050s 100-year storm and sea level rise

The Battery Coastal Resilience
Raising esplanade to protect against 2100 sea level rise

FiDi FORGE
Project Area includes 0.9 mile of shoreline

East Side Coastal Resiliency

Brooklyn Bridge-Montgomery Coastal Resilience (BMCR)
Series of floodwalls and deployable barriers to protect against 2050s 100-year storm and sea level rise

Seaport Coastal Resilience (SPCR) - *Not approved*
Raised esplanade to protect against 2100 sea level rise and small coastal storms today

FiDi and Seaport Climate Resilience Plan

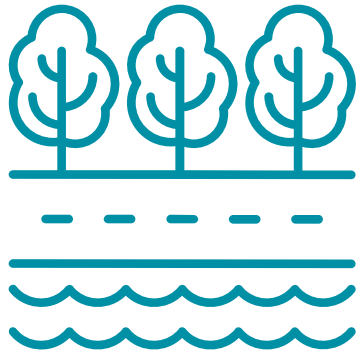
Released in 2021 by the New York City Economic Development Corporation (NYCEDC) and the Mayor's Office of Climate & Environmental Justice (MOCEJ), with **design advanced through 2025**.



Protect Lower Manhattan from tidal flooding and coastal storms



Integrate our climate resilience infrastructure into the city

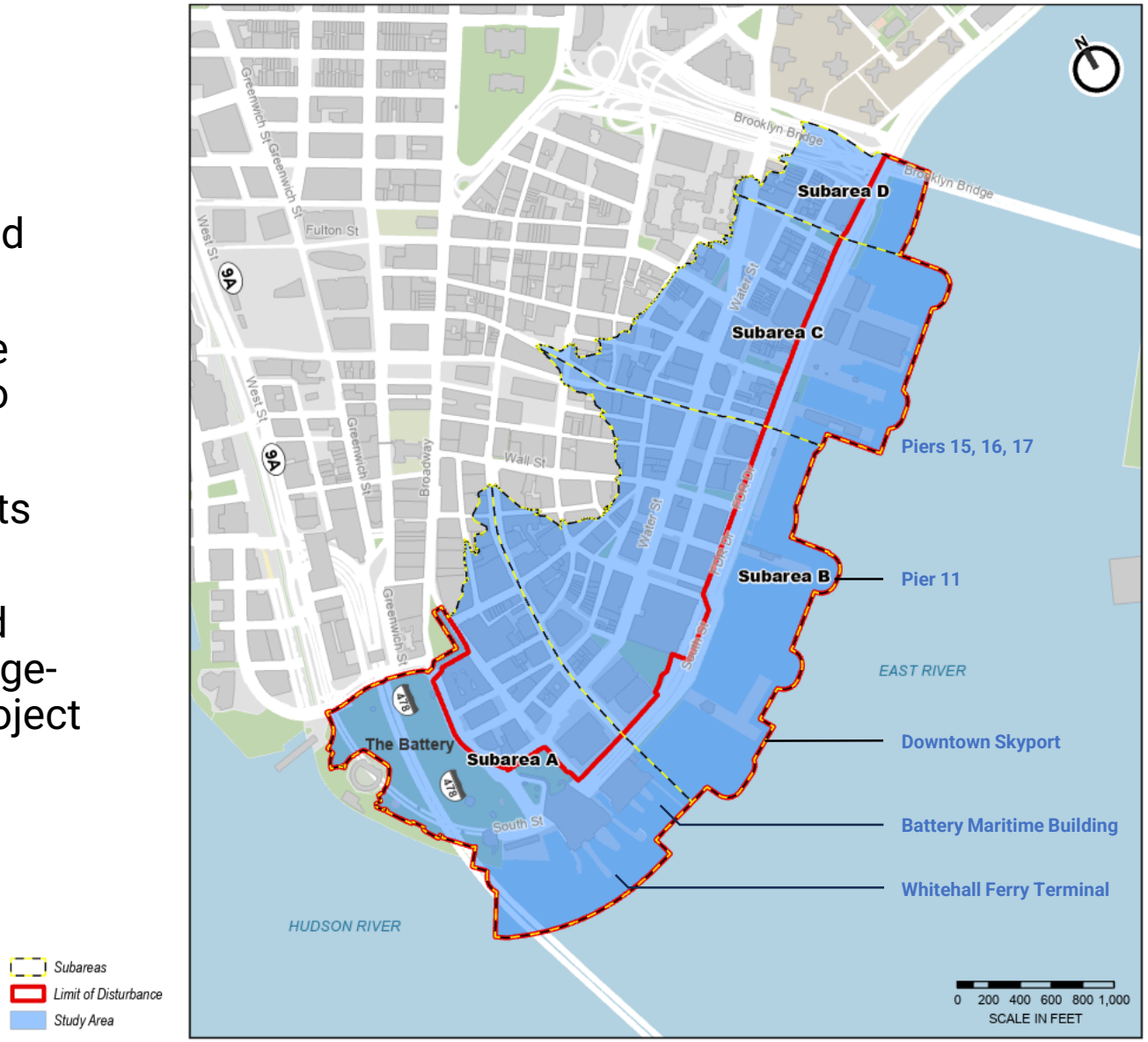


Enhance the public waterfront experience

Study Area Map

The Study Area comprises four subareas:

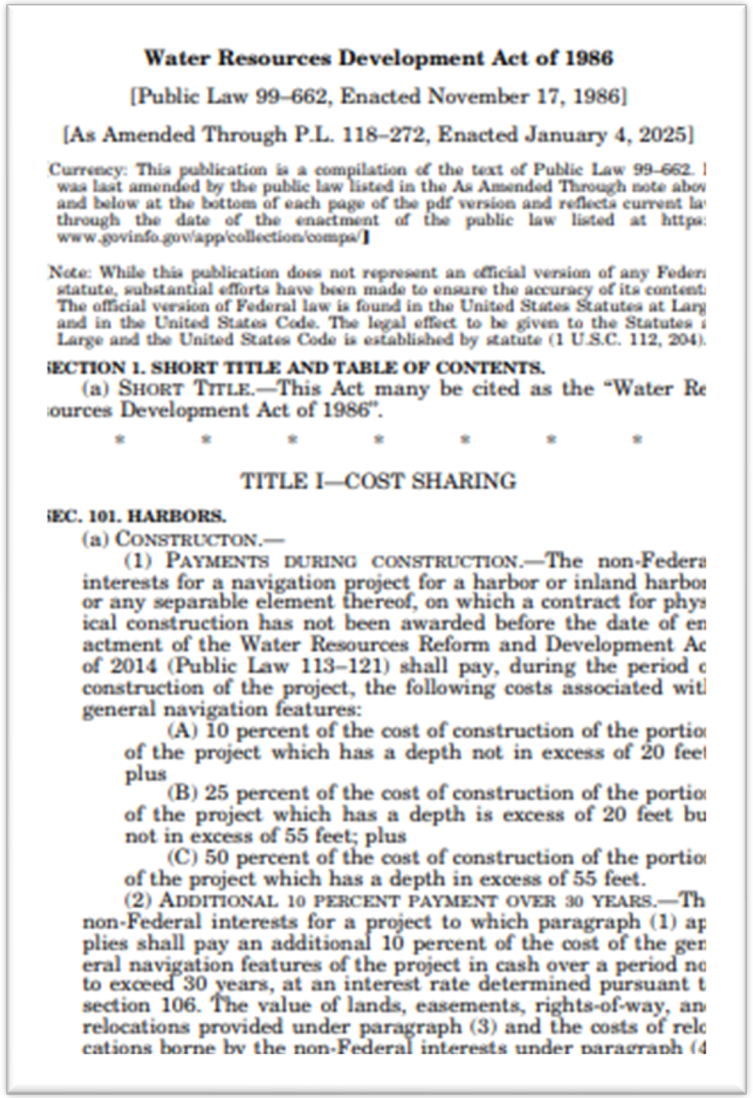
- **Subarea A** contains key maritime assets and ferry terminals
- **Subarea B** is characterized by the FDR Drive transitioning from ground-level boulevard to elevated overpass
- **Subarea C** is characterized by historic assets and uses in the Seaport District
- **Subarea D** includes the Brooklyn Bridge and northern tie-in to the adjacent Brooklyn Bridge-Montgomery Coastal Resilience (BMCR) project to the north



Section 203 Feasibility Study & Water Resources Development Act (WRDA) Process

Section 203 Water Resources Development Act (WRDA) of 1986, as Amended

- **Authorizes non-federal interests to undertake feasibility studies** of proposed water resource development projects for submission directly to the Secretary of the Army for Federal participation and cost share.
- **Requires non-federal interest conduct feasibility study on their own**, except limited technical and federal assistance may be provided by USACE, with the concurrence of Assistant Secretary of the Army, Civil Works (ASA[CW]), if the non-Federal interest pays for those services**.**
- The **ASA(CW) evaluates and reports** whether the project is feasible, providing any recommendations concerning project planning, design, or conditions for construction to congressional committees for inclusion and authorization in a Water Resources Development Act (WRDA).



Water Resources Development Act of 1986

[Public Law 99–662, Enacted November 17, 1986]

[As Amended Through P.L. 118–272, Enacted January 4, 2025]

Currency: This publication is a compilation of the text of Public Law 99–662. I was last amended by the public law listed in the As Amended Through note abov and below at the bottom of each page of the pdf version and reflects current la through the date of the enactment of the public law listed at https: www.govinfo.gov/app/collection/comps/]

Note: While this publication does not represent an official version of any Feder statute, substantial efforts have been made to ensure the accuracy of its content The official version of Federal law is found in the United States Statutes at Larg and in the United States Code. The legal effect to be given to the Statutes a Large and the United States Code is established by statute (1 U.S.C. 112, 204).

SECTION 1. SHORT TITLE AND TABLE OF CONTENTS.

(a) SHORT TITLE.—This Act many be cited as the "Water Re ources Development Act of 1986".

* * * * * * *

TITLE I—COST SHARING

SEC. 101. HARBORS.

(a) CONSTRUCTON.—

(1) PAYMENTS DURING CONSTRUCTION.—The non-Federa interests for a navigation project for a harbor or inland harbo or any separable element thereof, on which a contract for phys ical construction has not been awarded before the date of en actment of the Water Resources Reform and Development Ac of 2014 (Public Law 113–121) shall pay, during the period c construction of the project, the following costs associated wit general navigation features:

(A) 10 percent of the cost of construction of the portio of the project which has a depth not in excess of 20 fee plus

(B) 25 percent of the cost of construction of the portio of the project which has a depth is excess of 20 feet bu not in excess of 55 feet; plus

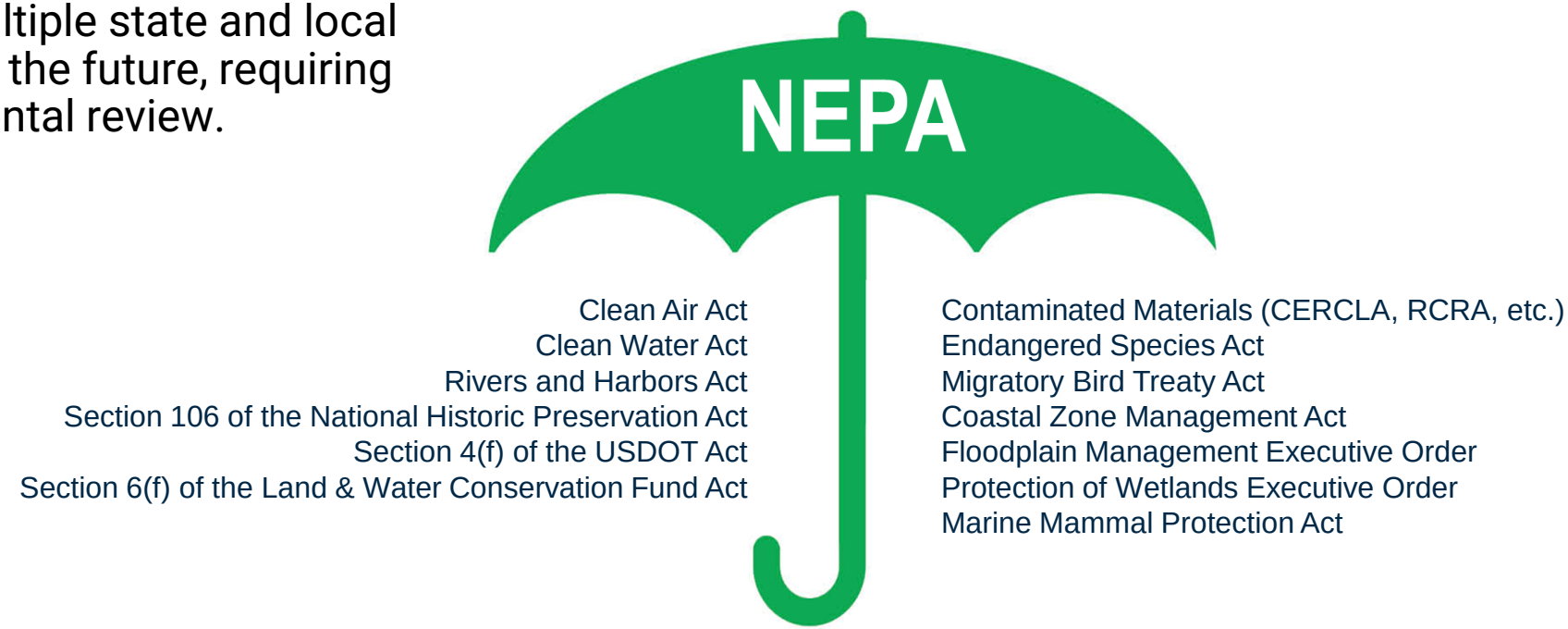
(C) 50 percent of the cost of construction of the portio of the project which has a depth in excess of 55 feet.

(2) ADDITIONAL 10 PERCENT PAYMENT OVER 30 YEARS.—Th non-Federal interests for a project to which paragraph (1) ap plies shall pay an additional 10 percent of the cost of the ge eral navigation features of the project in cash over a period no to exceed 30 years, at an interest rate determined pursuant t section 106. The value of lands, easements, rights-of-way, an relocations provided under paragraph (3) and the costs of relo cations borne by the non-Federal interests under paragraph (4

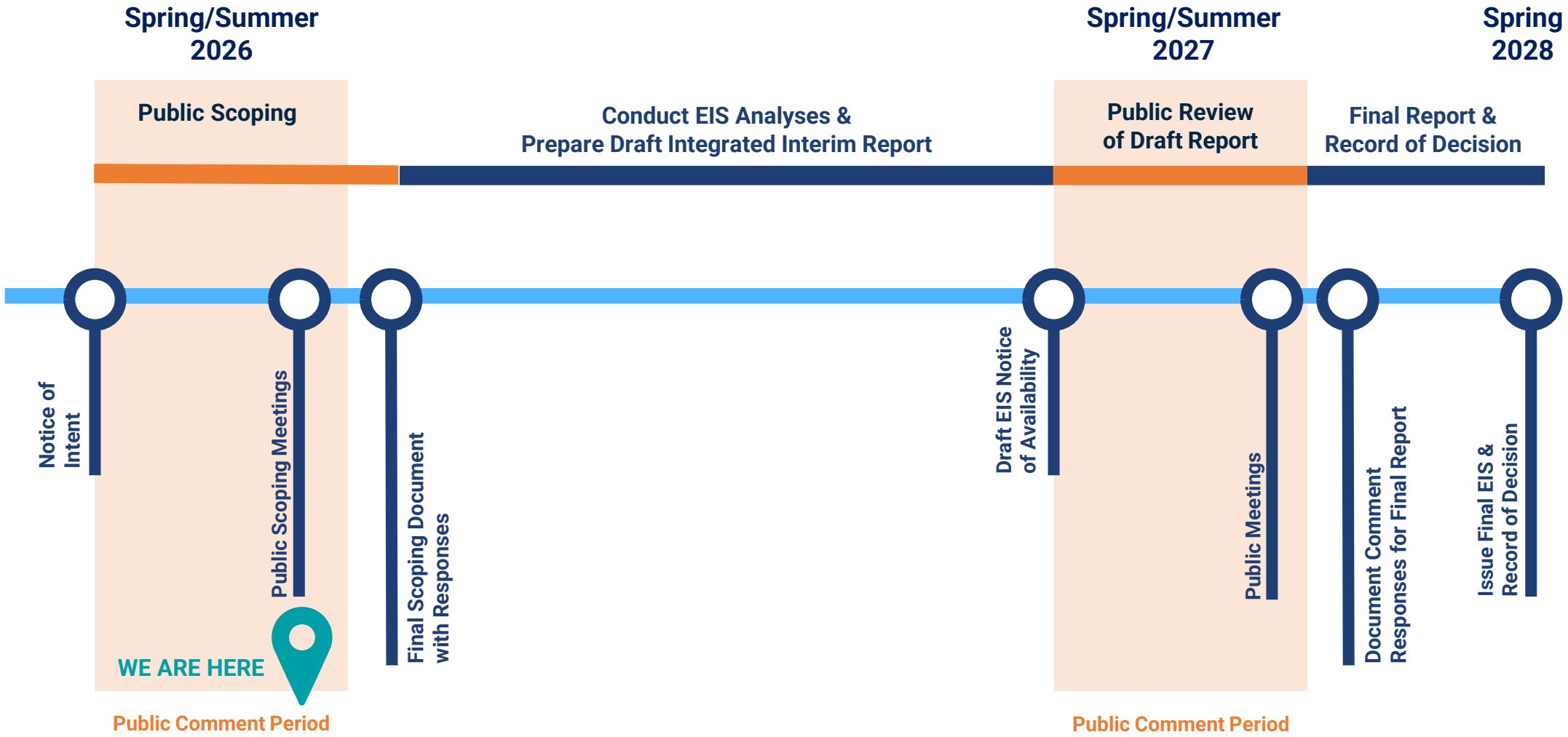
The National Environmental Policy Act (NEPA) Process

NEPA Environmental Review

- Environmental review under the National Environmental Policy Act (NEPA) of 1969.
- Public and agency engagement activities will fulfill other public reviews required by other federal laws.
- Conducted in accordance with *Department of War (DoW) National Environmental Policy Act Implementing Procedures* (April 30, 2026) and other federal requirements.
- As design progresses, multiple state and local permits will be pursued in the future, requiring state and local environmental review.



Throughout the process, there are opportunities for public comment. In the future when design continues, there will be additional opportunities.



Study Purpose and Objectives

Purpose Statement

The purpose of the study is to **manage the current and future coastal storm risk** to the FiDi FORGE study area of Lower Manhattan by creating a **coastal storm risk management system** integrated within the neighborhoods **while preserving and enhancing critical maritime, roadway, and public transit transportation services, emergency access, and waterfront access for all users.**



Flooded Battery Park Underpass located in study area.

Study Objectives to Address Needs

1. Provide a **coastal storm risk management system**.
2. Maintain functionality and reliability of **surface and subsurface transportation systems**.
3. Maintain **waterborne transportation services** along the East River.
4. Maintain and increase **vehicular and pedestrian access** to and from **waterfront destinations and historic/tourist amenities** in study area.
5. Reduce risk in mobilization by prioritizing **passive coastal storm risk management infrastructure**.
6. Balance **initial investment** with providing comprehensive coastal storm risk management.

Study Alternatives

Developing Range (Array) of Alternatives

For NEPA

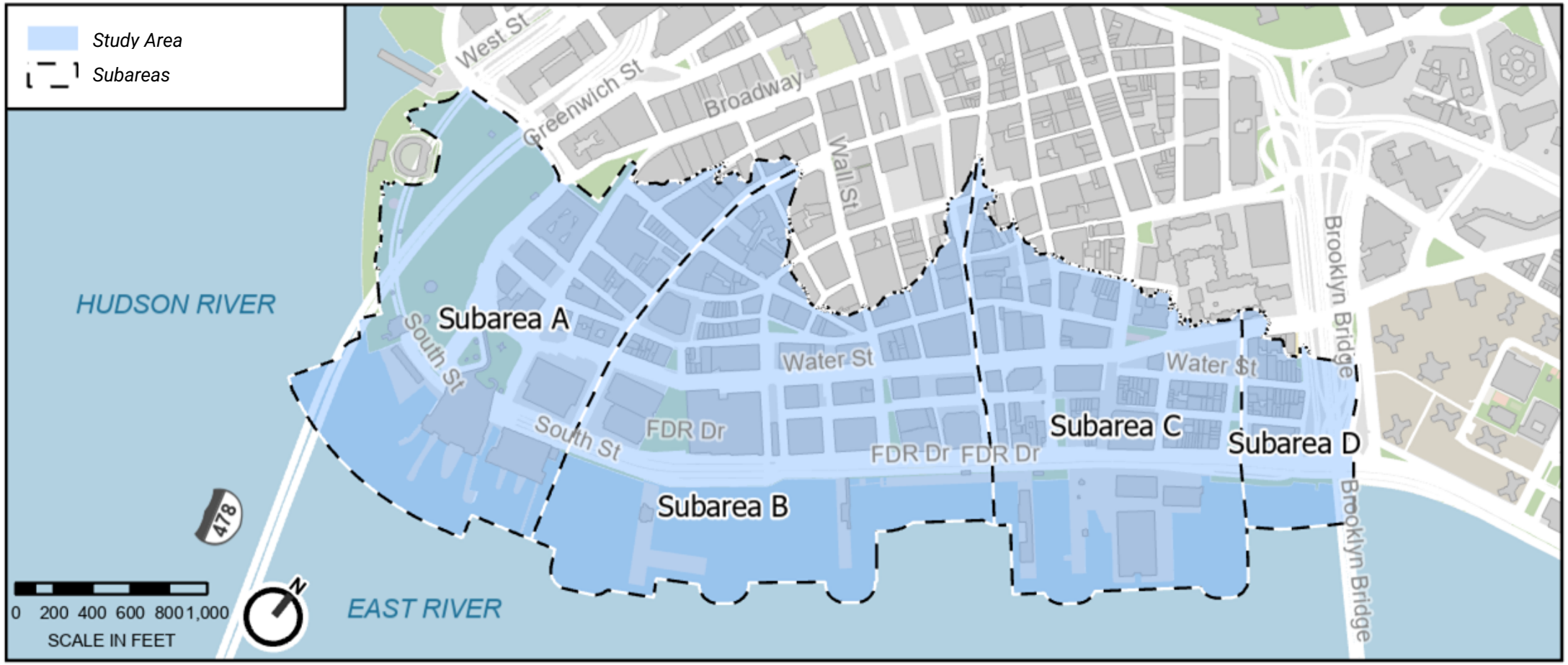
- Identify a range that is reasonable, which means the alternative must meet the study purpose and need
- Include No Build/No Action Alternative
- Identify reasonable alternatives that could reduce or avoid adverse effects

For Section 203

- Develop initial range (array) of alternatives based on USACE Principles and Guidelines criteria and study objectives

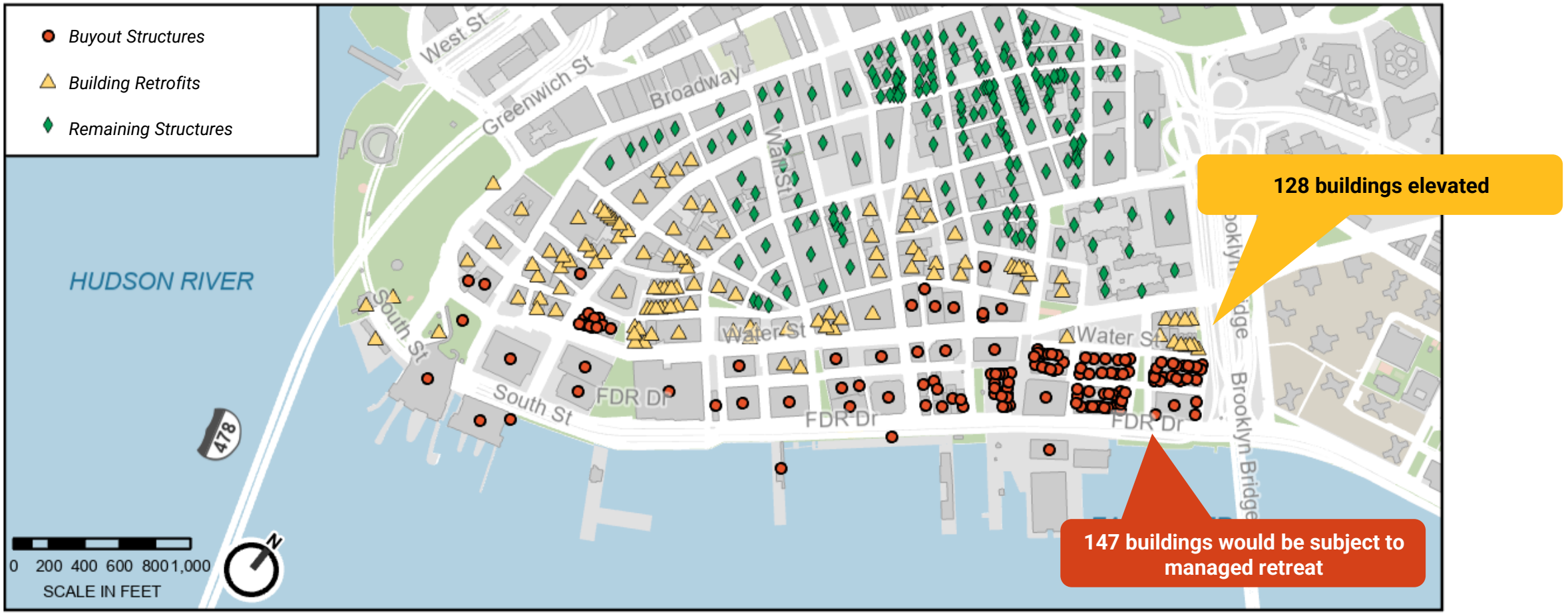
Initial Array – No Action Alternative

The “No Action” or “Future Without Project” (FWOP) alternative assumes there would not be construction of any coastal storm risk management measures in the study area over the study period. This **No Action Alternative is compared to other alternatives** to evaluate the benefits of constructing CSRM measures in the Integrated Report.



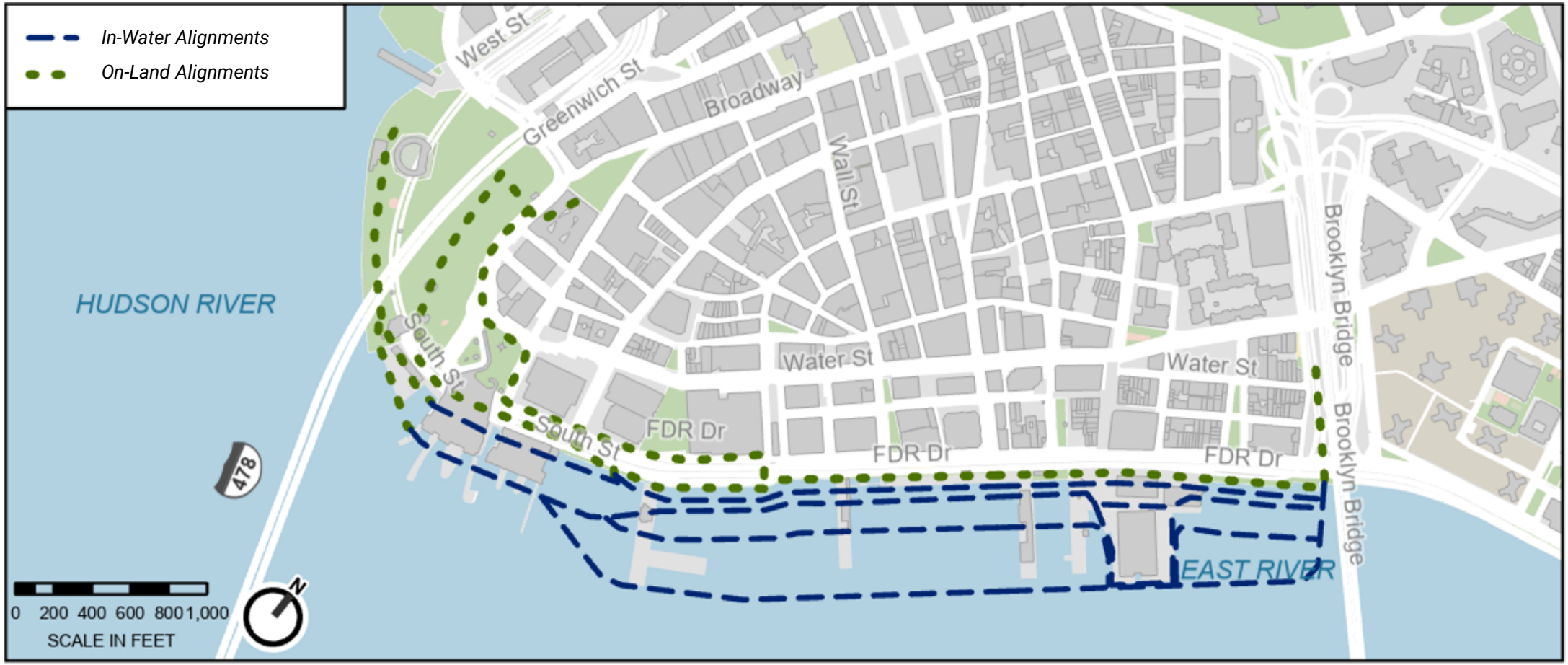
Initial Array – Nonstructural Approach

A nonstructural approach, in the form of a managed retreat strategy for the future monthly tidal floodplain as well as building retrofits (e.g. elevation) was found to be infeasible due to the **magnitude of required buyouts**, high market values, disruption to landmarks and the Seaport Historic district, and loss of critical maritime infrastructure along the waterfront.
This alternative was not advanced beyond the initial array.



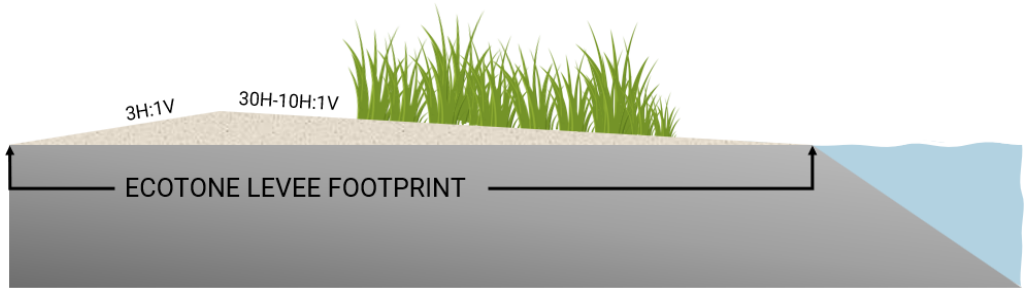
Initial Array – Structural Approaches

Two unique structural approaches were identified. The first is an **on-land approach** that would construct the CSRM measures along the existing bulkhead. The second is an **in-water approach** that would require an extension into the East River.

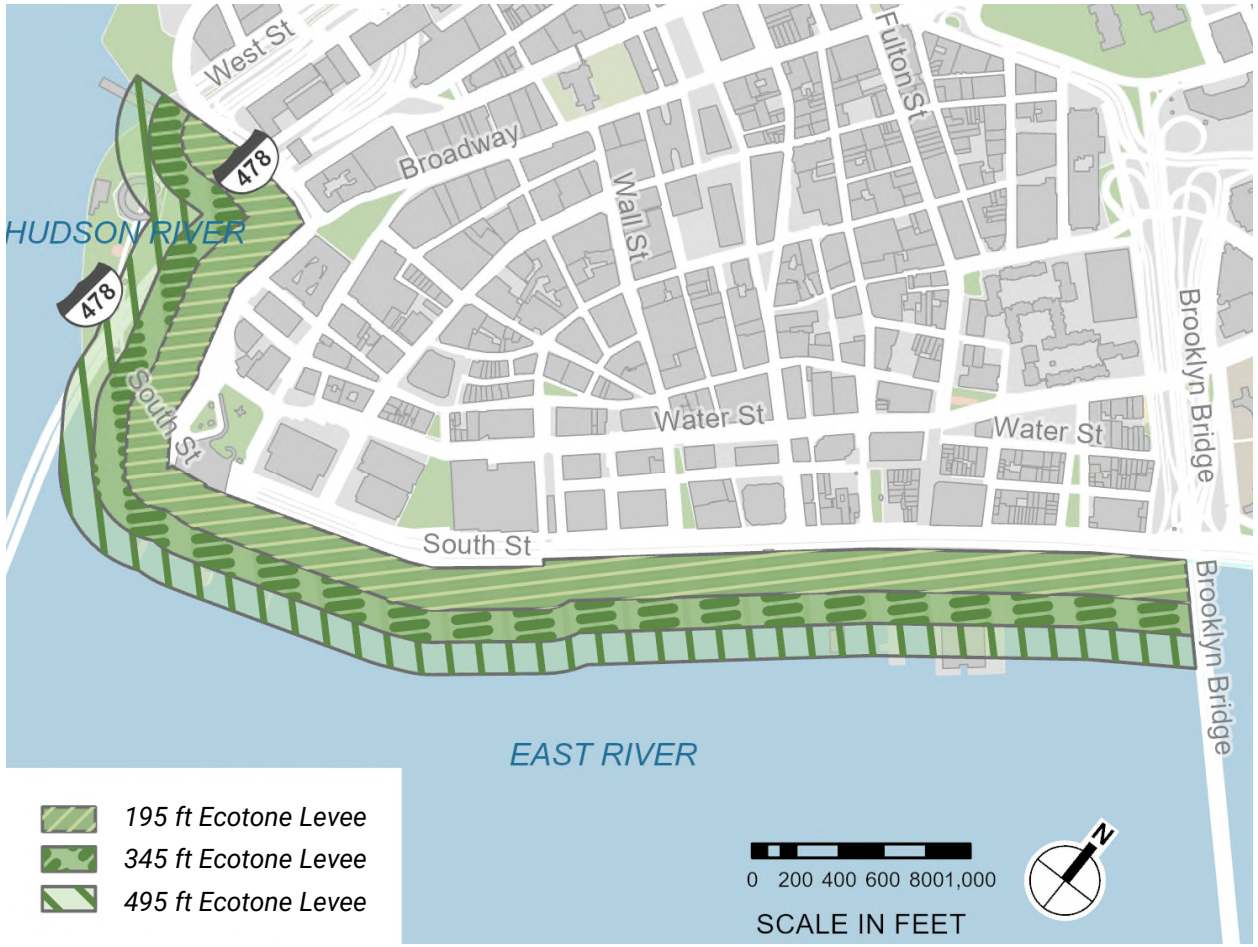


Initial Array – Nature-based Solutions Approach

An Nature-based Solutions Approach, in the form of an ecotone levee that wraps around the entire study was evaluated and found to be infeasible. This is because the extensive footprint needed to reach the design flood elevation would cause the loss of **maritime operations**, results in significant impacts to existing **aquatic habitats**, and disrupt critical **underground transit infrastructure**. **This alternative was not advanced beyond the initial array.**



Ecotone Levee Height (feet)	Slope		
	10H:1V	20H:1V	30H:1V
	Total Width (feet)	Total Width (feet)	Total Width (feet)
10	130	230	330
11	143	253	363
12	156	276	396
13	169	299	429
14	182	322	462
15	195	345	495



Design Features of Initial Approaches

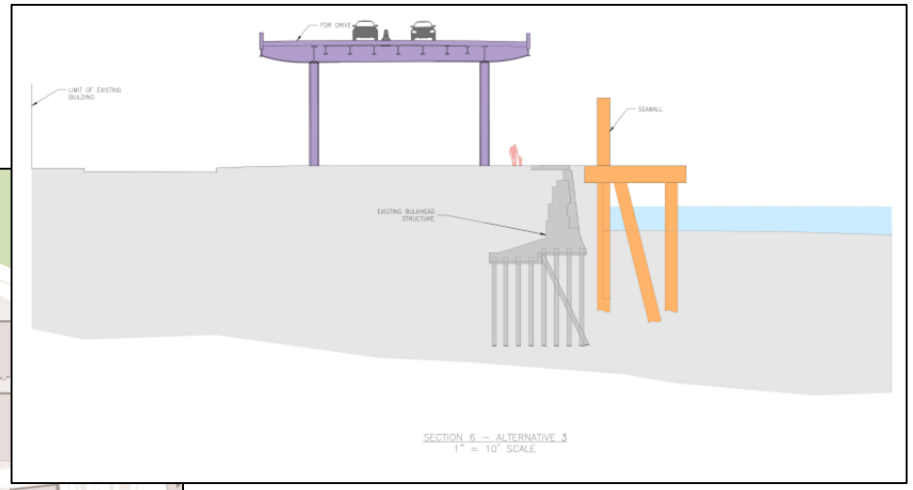
Thematic Approaches	Project Objectives Screening Average	USACE P&G Criteria Screening Average	Determination
1: No Action			**Required to advance**
2: Non-Structural	**Low**	**Low**	Screen out due to infeasibility
3: On-Land Structural	**Medium**	**Medium**	**Advance as alternative due to evaluation performance**
4: In-Water Structural	**High**	**High**	**Advance as alternative due to evaluation performance**
5: Nature-based Solutions	**Low**	**Low**	Screen out due to infeasibility

Final Array of Alternatives

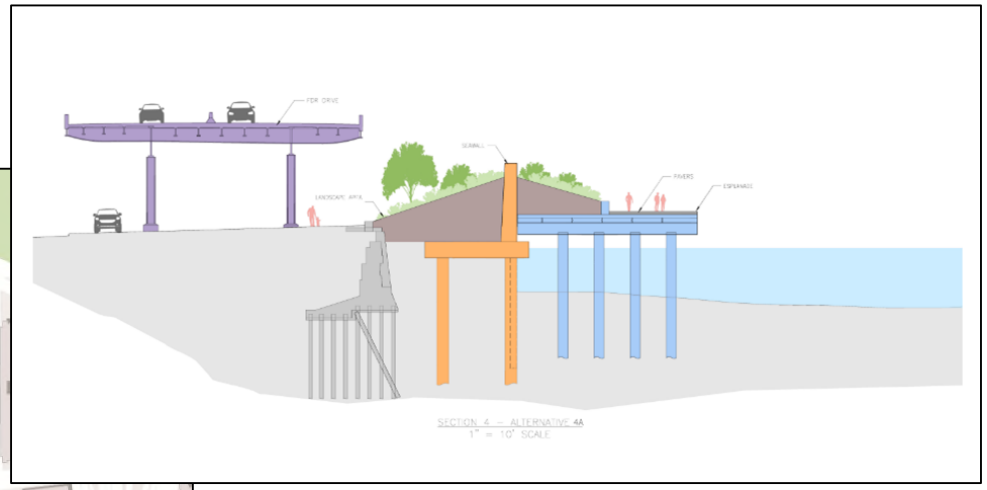
- No Action Alternative
- Structural Alternatives
  - Alternative 3: Along the Bulkhead
  - Alternative 4A: Narrow Shoreline Extension
  - Alternative 4: Medium Shoreline Extension

Alternative 3



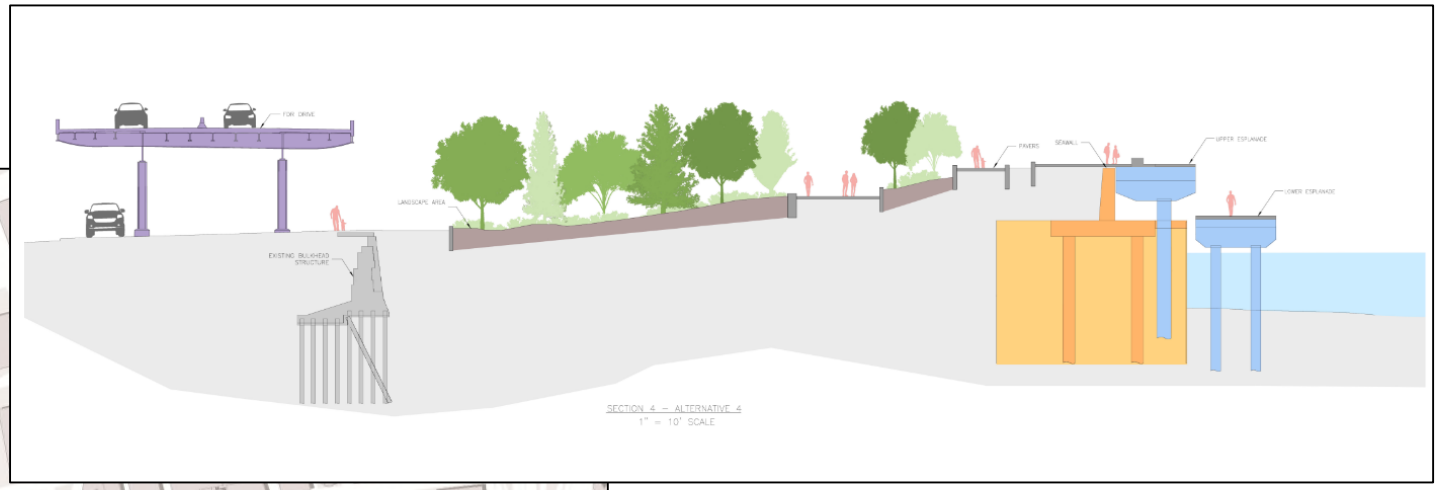


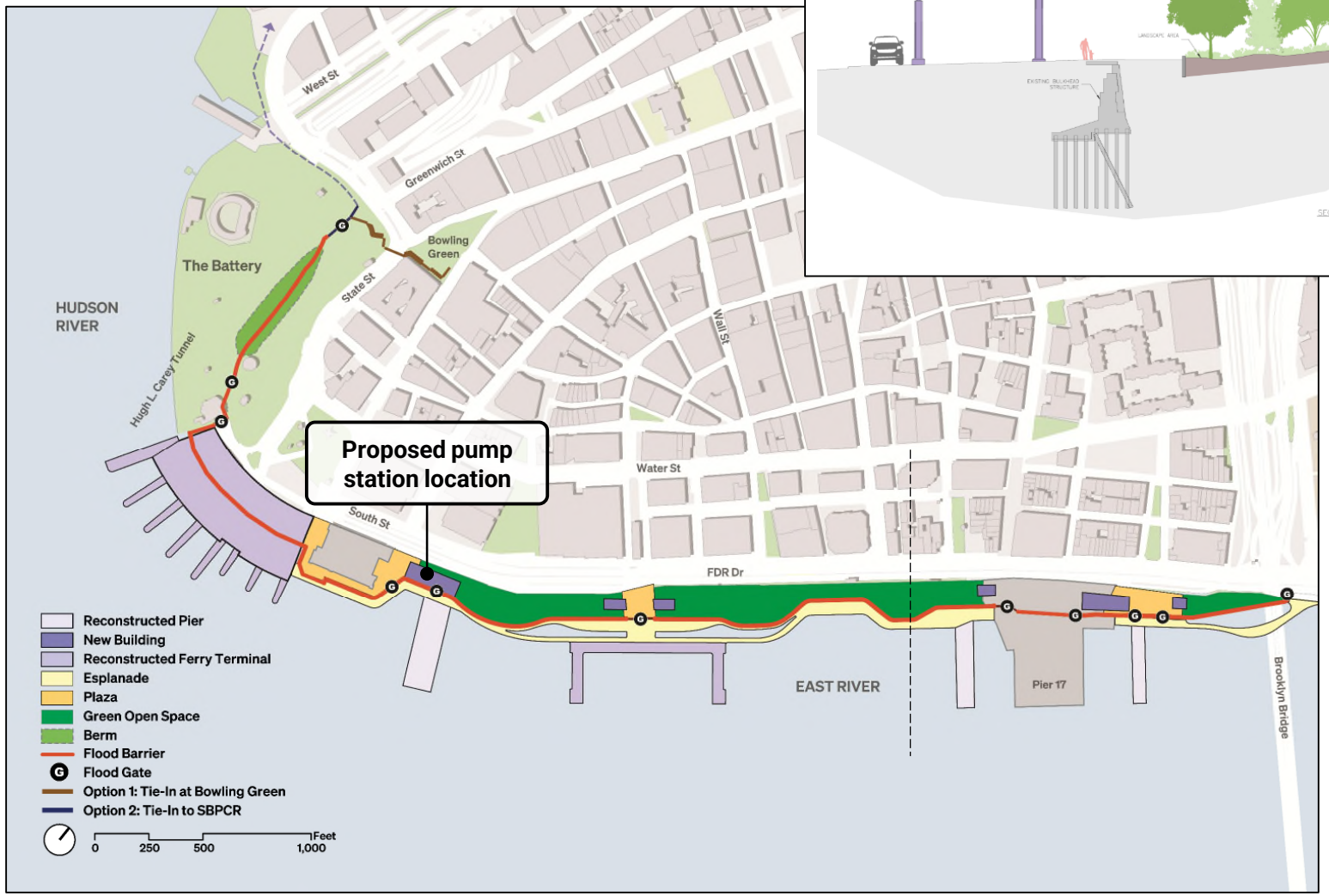
Alternative 4A





Alternative 4





Scope of EIS Analysis

EIS Analysis

- Assess existing and future conditions with and without the proposed activities for a 50-year period of analysis following construction.
- Analyze in accordance with Part 2.3 of the *Department of War National Environmental Policy Act Implementing Procedures, April 30, 2026*.
- EIS will evaluate three alternatives identified through a screening process in the Section 203 feasibility study.

Natural Environment

- Water Resources including Wetlands, Floodplains, Surface Waters
- Hydrology and Hydraulics, Sewer Infrastructure
- Water Quality
- Aquatic Biota
- Terrestrial Natural Resources
- Endangered and Threatened Species

Physical Environment

- Air Quality
- Geology, Topography, Soils, and Groundwater
- Noise and Vibration
- Cultural Resources (Archaeology and Architecture)
- Hazardous, Toxic, and Radioactive Wastes
- Recreation/Parklands/Open Space

Built Environment

- Transportation
- Navigation
- Coastal Zone Management

Human Environment

- Land Use, Zoning, and Public Policy
- Socioeconomic Conditions (including Neighborhood Character)
- Visual Resources

Note: Construction effects will be evaluated for each resource category













Resource Studies Underway

Next Steps & Near-Term Schedule

Next Steps and Timeline



Stay Informed of Project Updates and Opportunities for Input

Stay Informed

- Public notice and scoping document published by NYCEDC on study website (Find by selecting the following link: **www.fidiseaportclimate.nyc/environmental-review**)
- In Person EIS Scoping meeting: **June 23, 2026**
- Virtual EIS Scoping meeting: **June 25, 2026**
- Additional Virtual EIS Scoping meeting: **July 16, 2026**
- Public Comment period through **July 23, 2026**
- To stay involved, sign up for the FiDi FORGE Mailing List: **https://fidiseaportclimate.nyc/get-involved**

Project information will be posted at: **https://fidiseaportclimate.nyc/environmental-review**

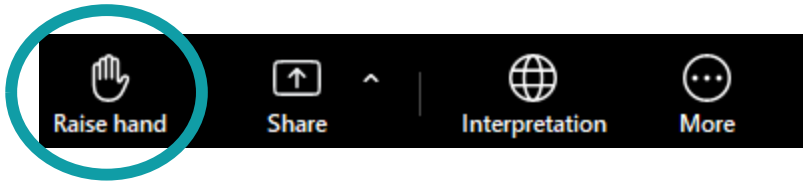
Public Comments

Scoping Comments

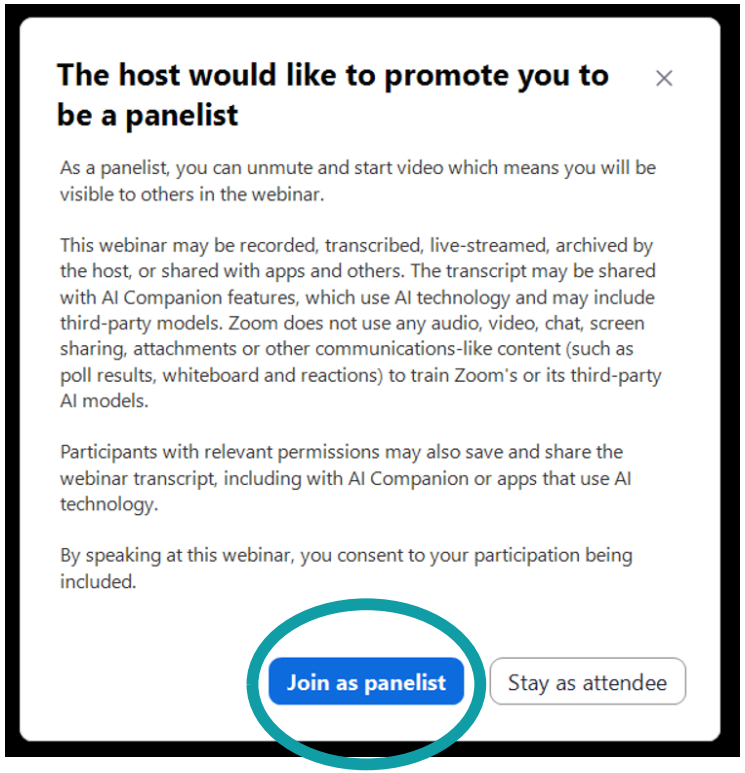
- Comments will become part of the project public record.
- We will not respond to questions at this meeting.
- Comments and responses will be incorporated into an EIS Scoping Comment and Response Memorandum after the close of the comment period.
- Record a comment several ways:
    1. verbally during this meeting, to be recorded by a stenographer
    2. submit an electronic comment via email to: **CENAN-FiDiFORGE-203-Study@usace.army.mil**

Scan QR code to submit written comment via email:

How to Provide a Verbal Comment



- This process is to ensure that **everyone has the opportunity to speak**.
- We will begin with speakers who indicated in their RSVP that they will leave a verbal comment.
- To provide a verbal comment:
  1. Press the '**Raise Hand**' button to get added to the list to speak
     - On dial-in: press *9 to raise your hand
  2. The moderator will lower the hand when you've been added to the list
  3. The name of the speaker will be called when it is their turn to speak
  4. The speaker will be promoted to a Panelist and will click "Join as a panelist" on the pop-up
  5. The speaker will be unmuted and provide their public comment
     - On dial-in: press *6 to unmute



How to Provide a Verbal Comment

- **Your public comment will be limited to 3 minutes.** If there is time at the end, attendees may be invited to leave additional comments. Additional comments will still be limited to 3 minutes.
- In your public comment, we encourage you to state and spell your name, any organizational affiliation, and connection to the project area. Each public comment will be transcribed.

Scan QR code to submit written comment via email to **CENAN-FiDiFORGE-203-Study@usace.army.mil**:

Attachment B
Scoping Informational Boards

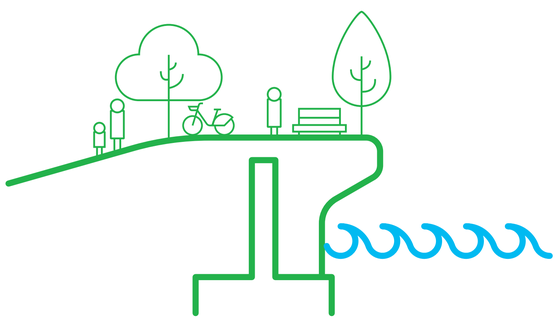
What is NEPA?

Financial District (FiDi) Fortifying Our Resilient Growth and Economy (FORGE) is subject to review in accordance with the National Environmental Policy Act (NEPA) of 1969. NEPA is a federal law that requires federal agencies to consider the effects of their policies, projects, or funding of projects on the built and natural environments. As part of the NEPA environmental review process, a range of reasonable alternatives must be evaluated.

In all proposed alternatives for FiDi FORGE, multiple measures will require in-water work, including fill and additional overwater coverage. Given the scale and anticipated scope of effects, FiDi FORGE will be reviewed under an Environmental Impact Statement (EIS).

The EIS analysis will be incorporated into an integrated report with the Section 203 feasibility study.

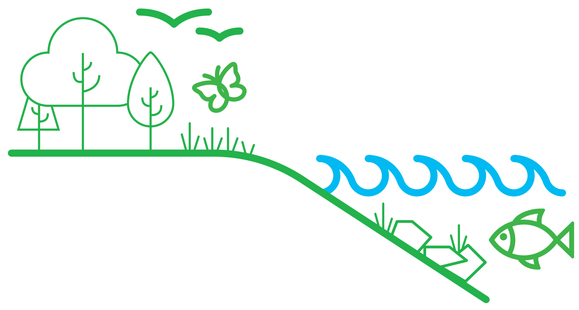
A variety of coastal storm risk management measures were evaluated for the study area to formulate distinct alternatives to evaluate:



Structural Measures
Includes measures such as flood walls, berms, levees, and more.



Non-Structural Measures
Includes measures such as flood policies and programs, buyouts, eduction, and more.



Engineering with Nature & Nature-Based Features (NNBFs)
Includes landscape elements, such as reefs, dunes, and more.

The U.S. Army Corps of Engineers (USACE), as the lead federal agency, has invited federal, state, and other appropriate parties to participate in the environmental review process by serving as Cooperating or Participating Agencies.

- U.S. Army Corps of Engineers
- New York City Economic Development Corporation
- U.S. Environmental Protection Agency
- U.S. Department of the Interior, Fish and Wildlife Service
- U.S. Coast Guard
- National Oceanic and Atmospheric Administration - Fisheries, Habitat and Ecosystem Services Division
- National Oceanic and Atmospheric Administration - Fisheries, Protected Resources Division
- Federal Emergency Management Agency
- Federal Aviation Administration
- National Park Service
- New York State Department of Environmental Conservation
- New York State Department of State

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Learn more
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What is Section 203?

Section 203 of the Water Resources Development Act (WRDA) of 1986, as amended, authorizes a non-federal interest to undertake feasibility studies of proposed water resource development projects for submission directly to the Secretary of the Army (Civil Works) for Federal participation and cost share. For FiDi FORGE, the non-federal interest is NYCEDC on behalf of the City of New York.

This means that the City can conduct its own feasibility study that follows U.S. Army Corps of Engineers (USACE) procedures and, if approved, could result in a federal funding match.

Section 203 Feasibility Study Process

Initiation

- USACE & non-federal interest enter into agreements for technical assistance and inherently governmental activities to be performed by USACE

Draft Feasibility Study & EIS

- Non-federal interest develops draft report & DEIS analyzing alternatives to arrive at tentatively selected plan
- Independent Peer Reviews
- USACE conducts interagency consultation and files DEIS
- Public comment period

Complete Study and EIS

- Non-federal interest develops final integrated report/ FEIS & incorporating public and agency comments
- USACE reviews documents

Submission to ASA(CW)

- Non-federal interest submits report to ASA(CW) who facilitates interagency review
- Record of Decision (ROD) issued

Submission to Congress

- ASA(CW) submits report to Congress with assessment
- Congress reviews as part of WRDA every 2 years for project authorization

The City will be conducting this study with defined support from the U.S. Army Corps of Engineers in the form of technical assistance and governmental activities.

Once the plan is finalized, the Assistant Secretary of the Army (Civil Works), known as the ASA(CW), evaluates the plan and reports whether the project is feasible, providing any recommendations concerning project planning, design, or conditions for construction to Congressional committees for inclusion and authorization in a Water Resources Development Act, which is passed by Congress every two years.

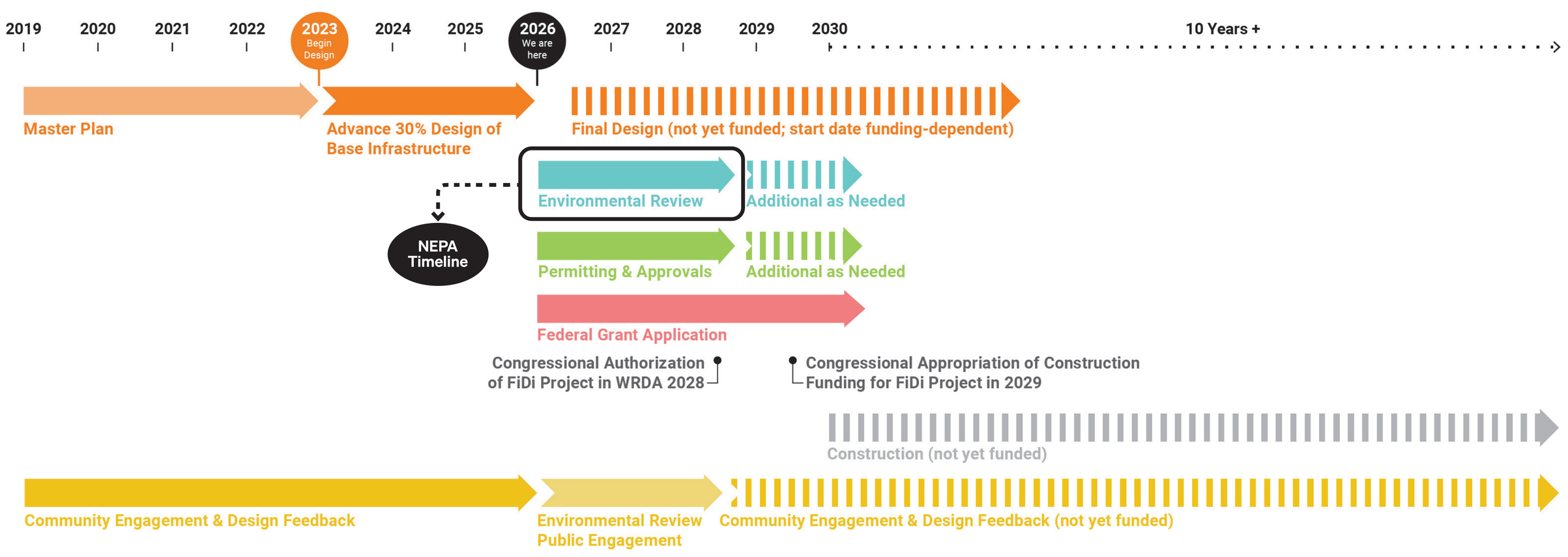
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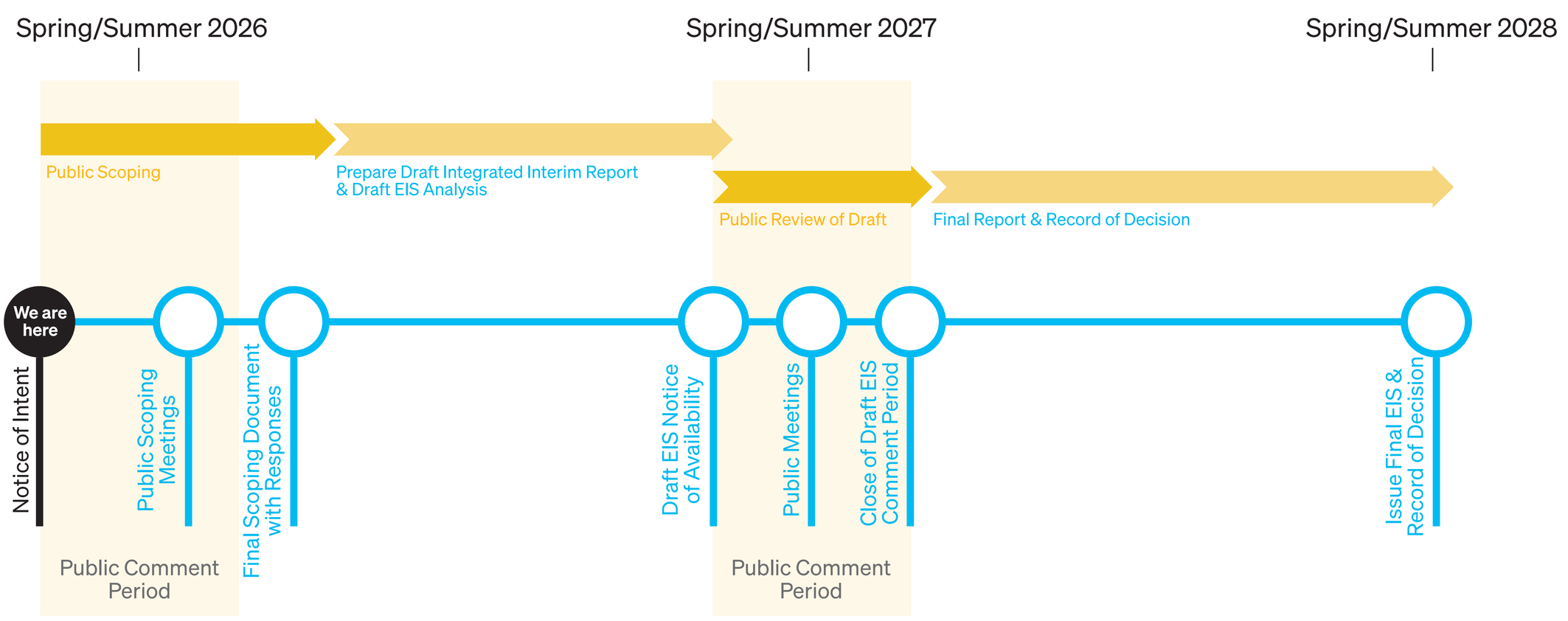
Scheduling & Timing

The preparation of an Environmental Impact Statement (EIS) officially begins with a public notice. Throughout the process, there are multiple opportunities for agency, public, and stakeholder coordination, highlighted in the schedule below!

Full Project Schedule



NEPA Timeline



Note: State and City Environmental Quality Review and permitting approvals will be sought in the future.

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Work to Date

Community Engagement

From public workshops to site tours, community input was critical to all phases of design and development of Financial District (FiDi) Fortifying Our Resilient Growth and Economy (FORGE), also known as the FiDi-Seaport Climate Resilience Plan.

As we move forward with the Section 203 feasibility study, we will continue to engage with the community and incorporate your feedback. Check out our project schedule to learn more about opportunities to engage.

26 Tabling events engaged community members in busy public places.



Resilience+ Expo



FiDi FORGE tabling event

19 Public workshops and stakeholder presentations gathered design feedback and shared information about the project.



FiDi FORGE community workshop



FiDi FORGE community workshop

13 Walking tours helped the public envision a resilient future for Lower Manhattan.



FiDi FORGE community walking tour



FiDi FORGE community walking tour

Understanding and Supporting East River Ecology

Understanding the East River's ecology and finding ways to actively support its ecosystems, rather than merely minimizing impact, has been core to studying coastal storm risk management options for FiDi-Seaport. To support this effort, an Aquatic Resources Advisory Council (ARAC) was assembled and met nine times to date.

The project team conducted two years (2021 and 2022) of biological and habitat sampling and testing to assess habitat conditions and marine life in the area. A third year is currently underway.

Over 1,500 samples have been collected from the Lower East River, and a third year of sampling and testing is currently underway!

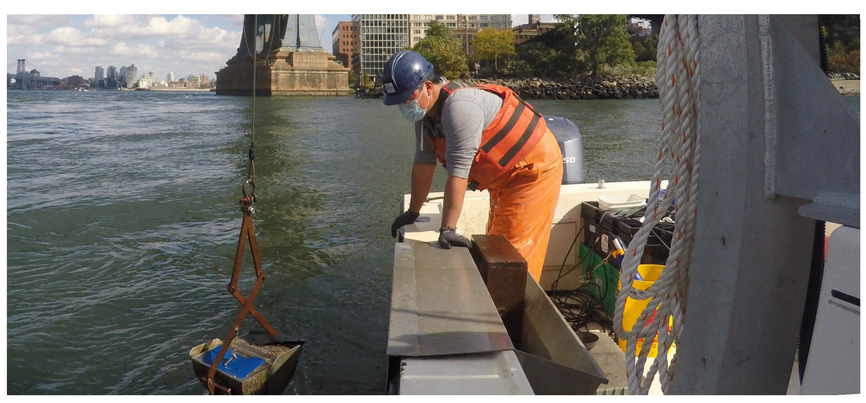


Image of sampling in the East River



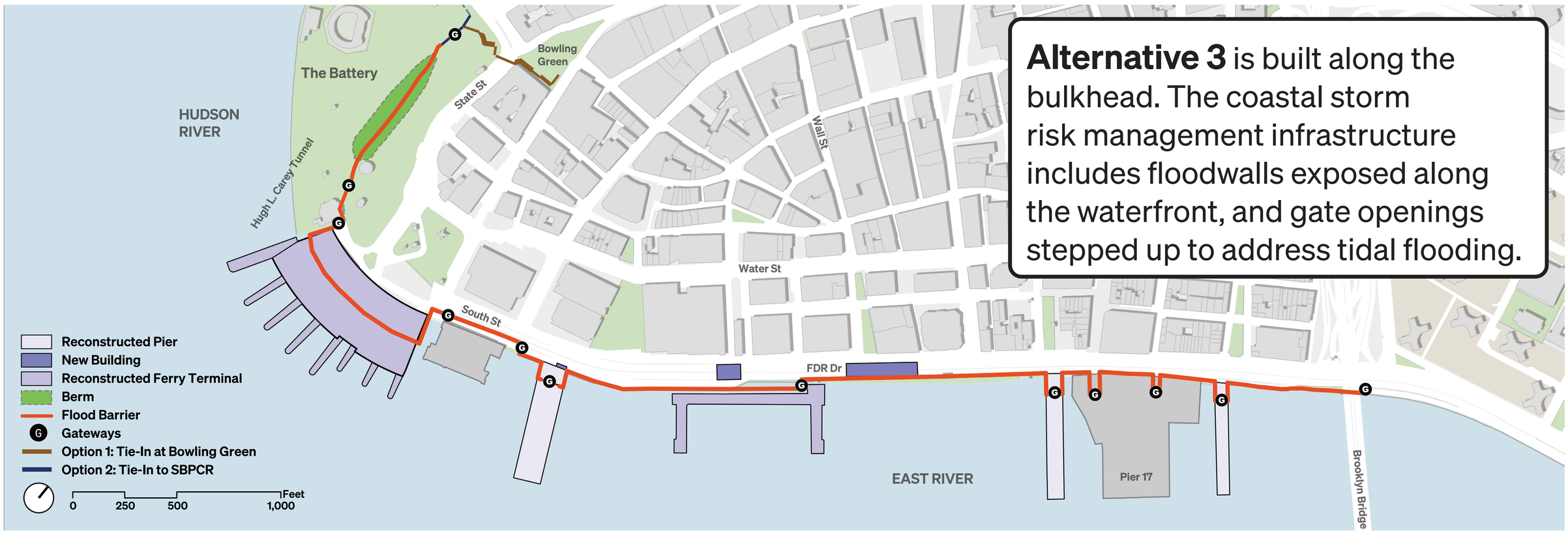
Image of sampling in the East River

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Final Array of Alternatives

After screening a number of different alignments and alternatives against U.S. Army Corps of Engineers (USACE) Principles & Guidelines and the project objectives, three alternatives were selected for further study and evaluation in the feasibility study, in addition to the No Action Alternative.



Alternative 3 is built along the bulkhead. The coastal storm risk management infrastructure includes floodwalls exposed along the waterfront, and gate openings stepped up to address tidal flooding.



Alternative 4 is built into the water. The floodwall is integrated with a park, and the gate openings are raised to protect against future sea level change.



Alternative 4A is built into the water. The floodwall is exposed, and the gate openings are raised to protect against future sea level change.

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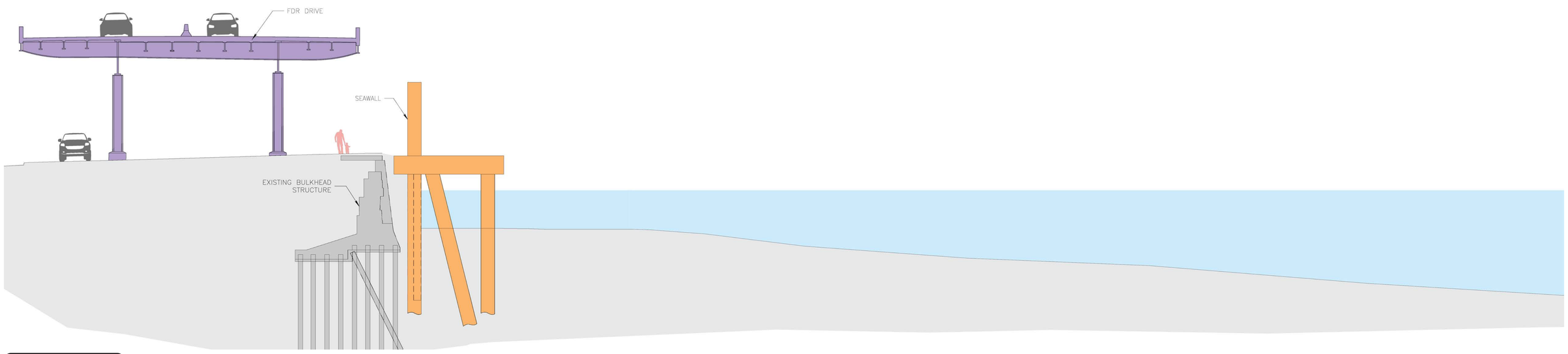
Learn more
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Alternative 3: Bulkhead

Alternative 3 proposes an exposed floodwall constructed along the existing bulkhead, maintaining at least a five-foot clearance from the elevated FDR Drive, as required by New York State Department of Transportation.

Ring walls would be installed around the base of each pier with floodgates set above the tidal flooding elevation to enable pedestrian, vehicle, and emergency access during non-flood conditions.

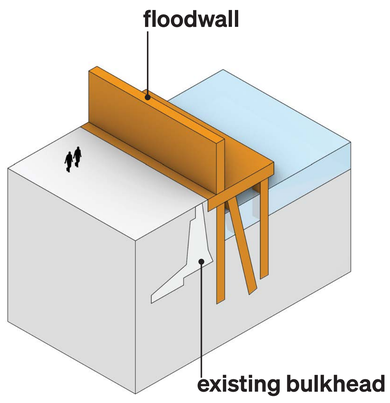
This alternative would not construct a waterfront esplanade on the outboard, or "wet" side, of the floodwall.



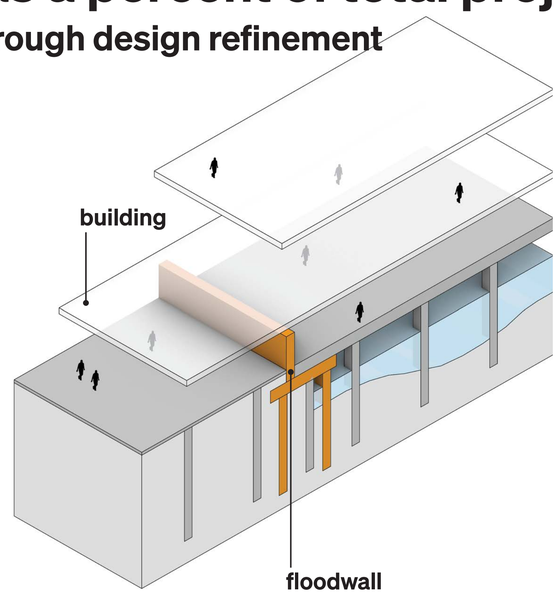
Section A **Ilustrative section cut of Alternative 3**

Flood protection features as a percent of total project area

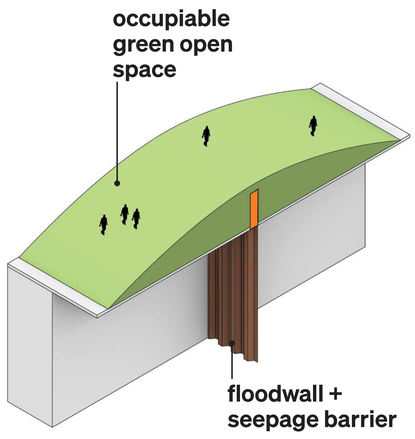
Note: Percentages subject to change through design refinement



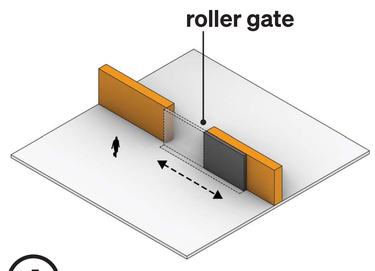
① **80%** Exposed Floodwall



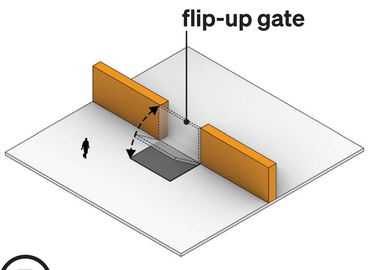
② **12%** Floodwall in Building



③ **8%** Buried Floodwall



④ Roller gates



⑤ Flip-up gates



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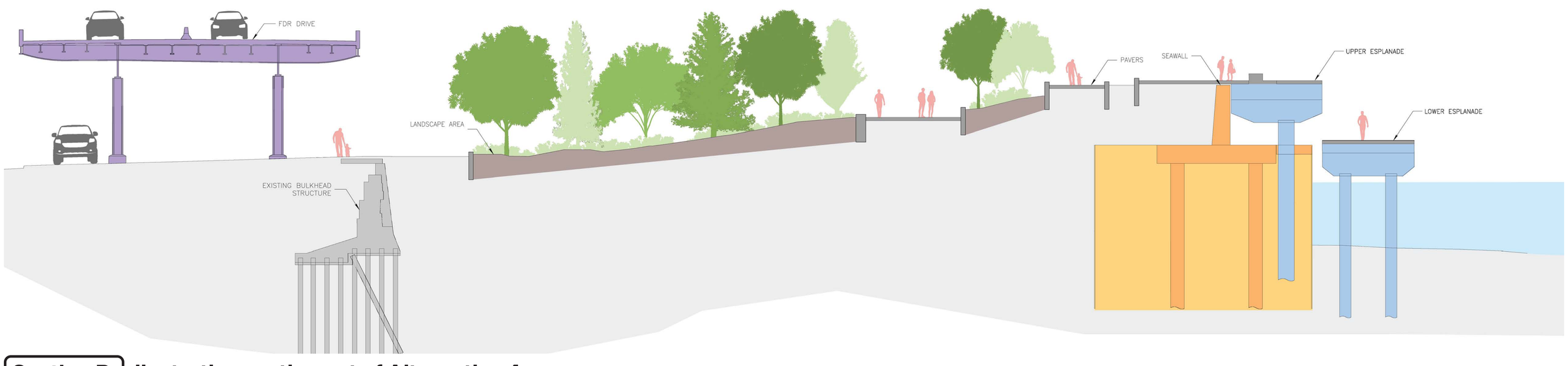
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Alternative 4: Medium Extension

Alternative 4 involves a medium-scale extension of the shoreline into the East River in a portion of the study area, and elevating the waterfront.

This alternative buries the proposed floodwall under publicly accessible green open space.

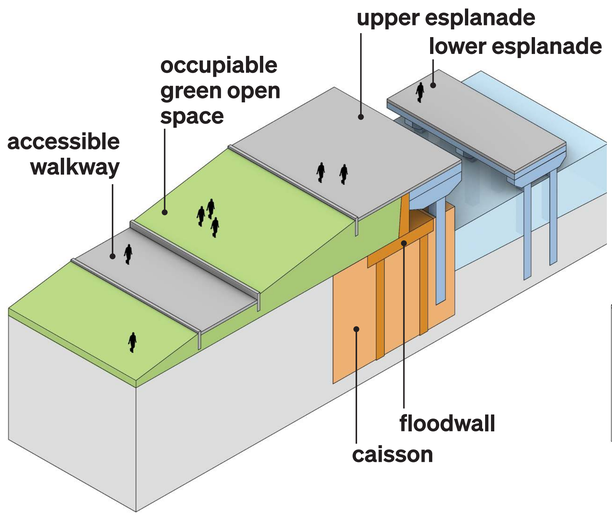
This alternative expands to the waterfront by introducing a new waterfront esplanade built on the outboard, or "wet" side, of the floodwall and includes provisions for public access to both the top of the line of defense (via up and over walking paths) and the lower waterfront through a series of floodgates (elevated above the tidal flooding elevation).



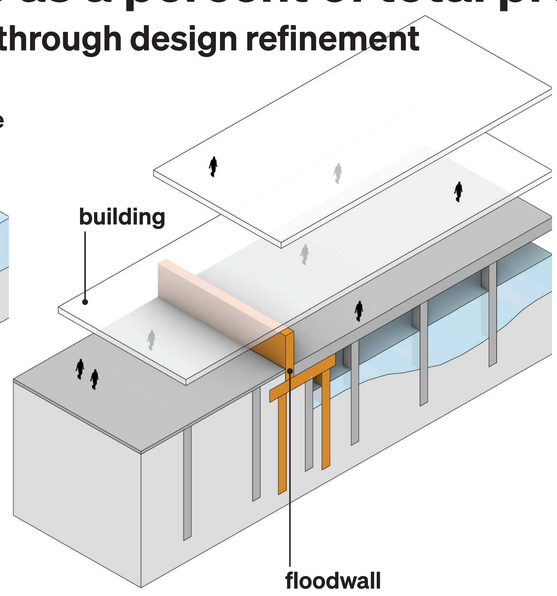
Section B **Ilustrative section cut of Alternative 4**

Flood protection features as a percent of total project area

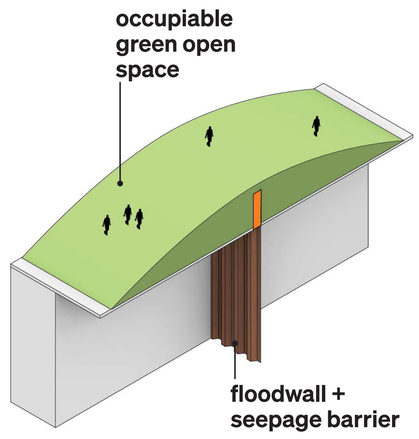
Note: Percentages subject to change through design refinement



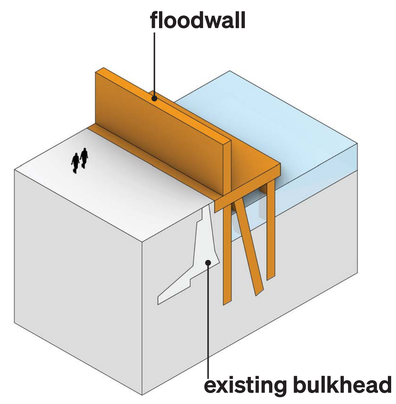
① **75%** Buried Floodwall with Multi-level Esplanade



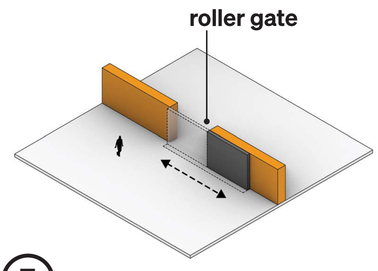
② **12%** Floodwall in Building



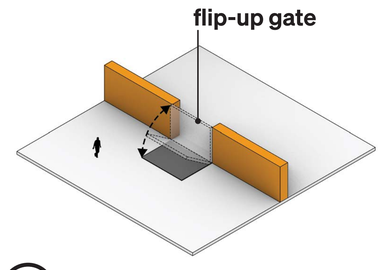
③ **8%** Buried Floodwall



④ **5%** Floodwall



⑤ Roller gates



⑥ Flip-up gates



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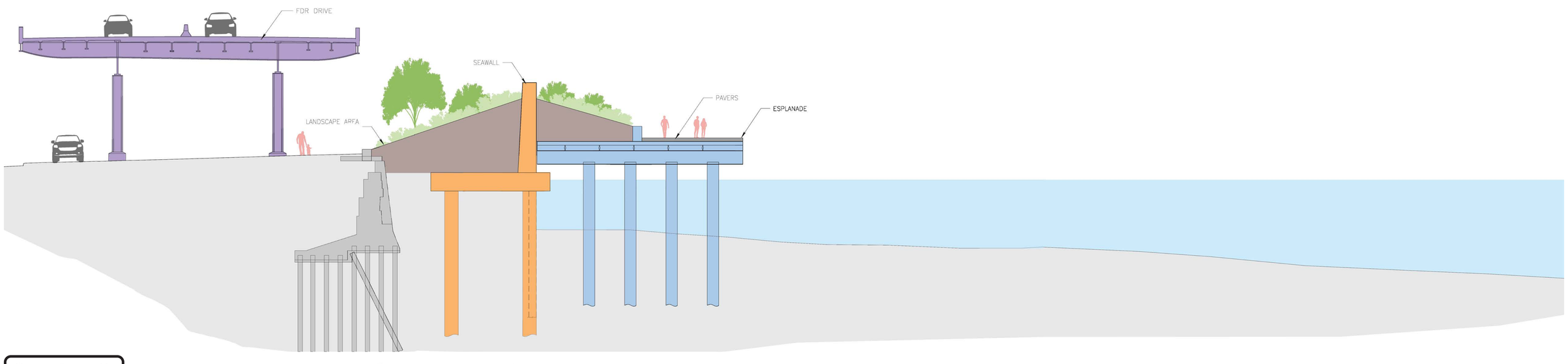
Learn more
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Alternative 4A: Narrow Extension

Alternative 4A proposes a narrow shoreline extension into the East River, designed to elevate the shoreline to a passive level of protection for future tidal flooding.

The extension would incorporate a partially buried floodwall with inaccessible green space on both sides of the floodwall, and a new waterfront esplanade built on the outboard, or "wet" side, of the floodwall.

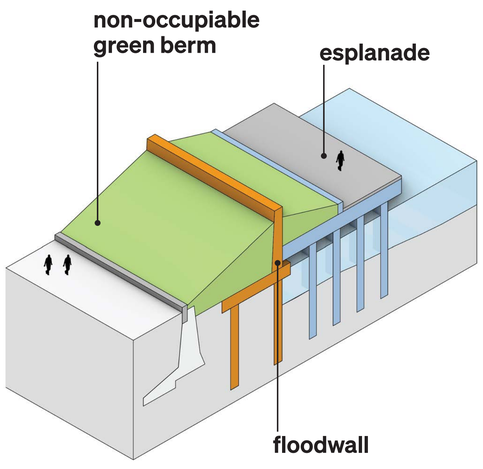
Connectivity to the waterfront would be maintained at priority street corridors where floodgates provide direct access to the new esplanade and reconstructed piers.



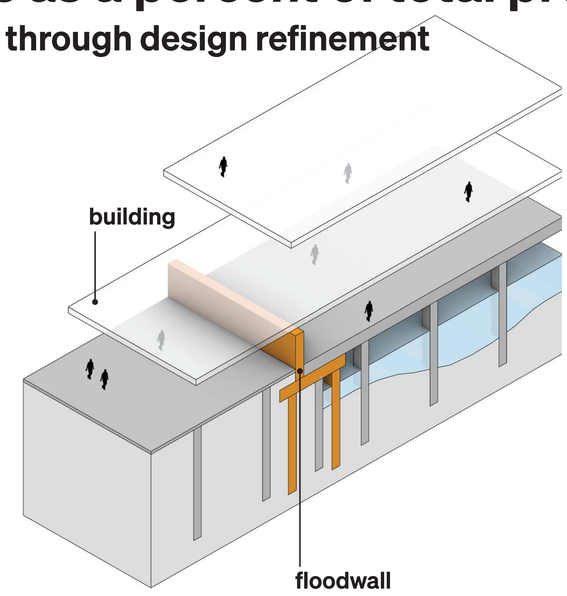
Section C **Ilustrative section cut of Alternative 4A**

Flood protection features as a percent of total project area

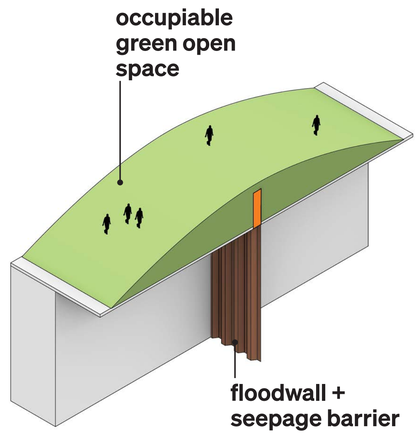
Note: Percentages subject to change through design refinement



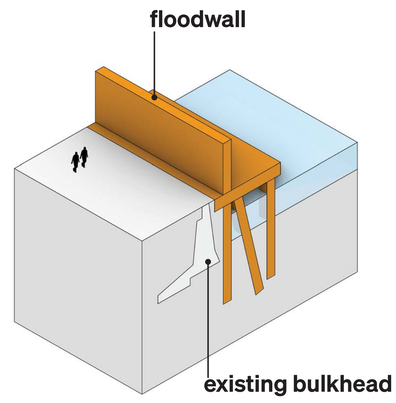
① **75%** Partially Buried Floodwall with Esplanade



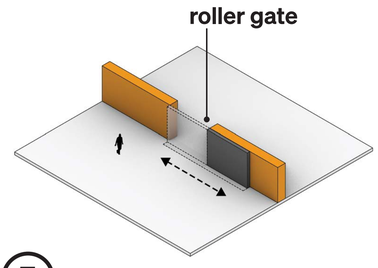
② **12%** Floodwall in Building



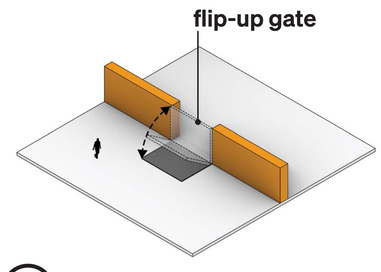
③ **8%** Buried Floodwall



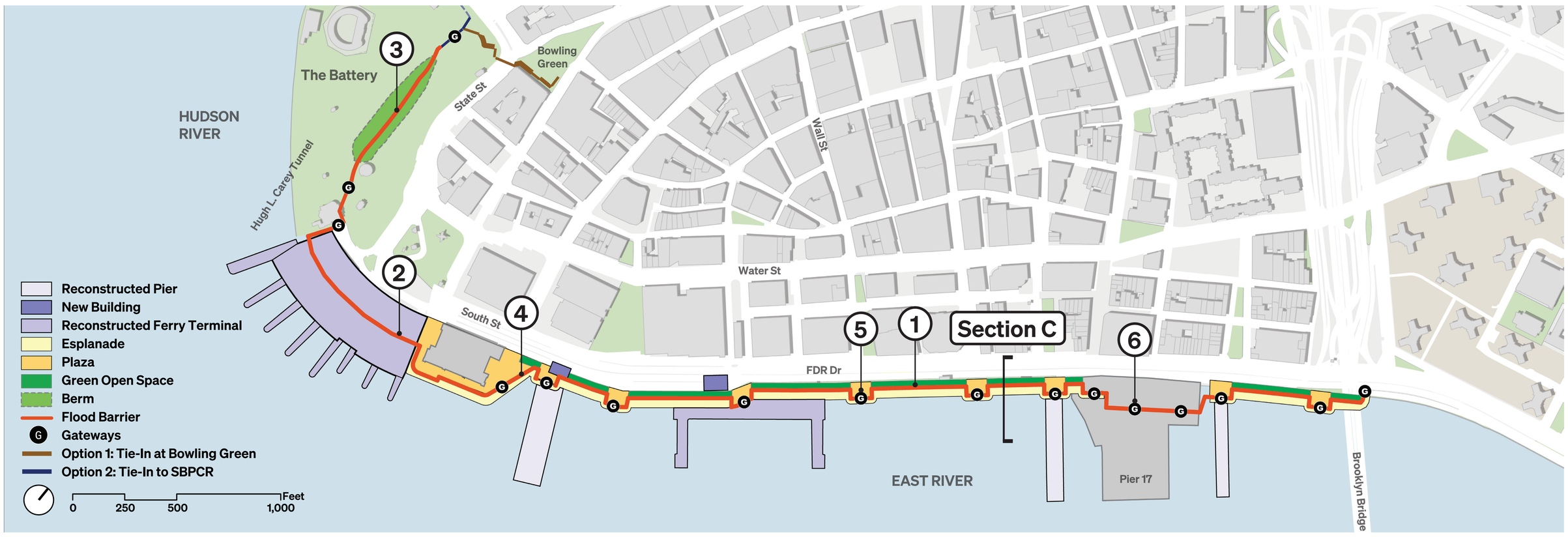
④ **5%** Floodwall



⑤ Roller gates



⑥ Flip-up gates



FiDi and Seaport
Fortifying Our Resilient Growth & Economy

Learn more
fidiseaportclimate.nyc

Attachment C
Notice of Intent

Announcement of Additional Scoping Meeting and Scoping Period Extension for Draft Integrated Interim Feasibility Report and Environmental Impact Statement Financial District and Seaport Fortifying Our Resilient Growth and Economy (FiDi FORGE) Coastal Storm Risk Management Section 203 Study

The U.S. Army Corps of Engineers (USACE), New York District (District), in coordination with the non-federal interest, New York City Economic Development Corporation (NYCEDC) is undertaking a feasibility study to examine measures to manage future flood risk and reduce the economic costs and risks associated with flood and storm events that are affecting the Financial District and Seaport study area under the authority provided by the U.S. Congress in Section 203 of the Water Resources Development Act (WRDA) of 1986, as amended. Under Section 203, NYCEDC intends to prepare a Draft Integrated Interim Feasibility Report and Environmental Impact Statement (EIS) in compliance with the National Environmental Policy Act (NEPA) and the Department of War National Environmental Policy Act Implementing Procedures (April 30, 2026).

The study area is approximately 0.9 miles of the East River waterfront in Lower Manhattan, New York County, New York and is located within the ongoing New York and New Jersey Harbor and Tributaries (NYNJHATS) Coastal Storm Risk Management (CSRM) Feasibility Study. The purpose of the study is to minimize the current and future coastal storm flood risk to the FiDi FORGE study area of Lower Manhattan by creating a coastal storm risk management system integrated within the neighborhoods while preserving and enhancing critical maritime, roadway, and public transit transportation services, emergency access, and waterfront access for all users. The District is soliciting public participation and input on the scope of the Draft Integrated Interim Report, including alternatives and potential effects, as well as the relevant information, studies, or analyses to inform the evaluation.

The public is invited to submit comments related to the scope and preparation of the Draft Integrated Interim Report during this scoping period. Two scoping meetings were held on June 23 and June 25, 2026. **A third virtual public scoping meeting will be held on July 16, 2026, from 3:00-5:00 PM**. As such, the **scoping period** which began on May 28, 2026, **is extended through July 23, 2026**. Registration for the scoping meetings is available through this link (Public Scoping Meeting for the FiDi FORGE Draft Integrated Interim Feasibility Report & EIS).[6] Information regarding the meeting and other select materials may be translated and provided upon request. NYCEDC will consider and seek to accommodate all reasonable translation requests.

FOR FURTHER INFORMATION: For more information, refer to the FiDi FORGE Scoping/Additional Information Document at the study website at the following link:

[6] https://forms.office.com/pages/responsepage.aspx?id=fQWQf6A-_kawfOBWhicIG4cZ_OZB4i5GtJZDww6dkstUQ1ZVRTZLUkZBQVEzSTE1M1dBV0NOVEpNSC4u&route=shorturl

https://fidiseaportclimate.nyc/environmental-review. Questions or comments regarding the Integrated Interim Report may be directed to the NEPA POC, Cheryl Alkemeyer, NEPA by email at: CENAN-FiDiFORGE-203-Study@usace.army.mil.

The District currently estimates that the Draft Integrated Interim Report will be available for public review and comment in Spring 2027. At that time, the USACE will provide a 60-day public review period for individuals and agencies to review and comment.

Comments submitted will assist in the agency's evaluation of the project changes and will be reflected in the project record.

All written comments, including contact information, will be made a part of the administrative record, available to the public under the Freedom of Information Act (FOIA). The Administrative Record, or portions thereof, may also be posted on an U.S. Army Corps of Engineers' Internet website. Due to resource limitations, this office generally cannot acknowledge receipt of comments or respond to individual letters.

Attachment D
Comment Submissions and Meeting Transcriptions

Outlook

[Non-DoD Source] Scoping Comments — FiDi

From April Hawthorne <april@ecosystemlogic.com>
Date Thu 6/25/2026 10:46 PM
To CENAN-FiDiFORGE-203-Study <CENAN-FiDiFORGE-203-Study@usace.army.mil>
Cc fidiforge@edc.nyc <fidiforge@edc.nyc>

Attn: Cheryl Alkemeyer, NEPA Point of Contact
U.S. Army Corps of Engineers, New York District
New York City Economic Development Corporation

Re: Scoping comments — FiDi FORGE Coastal Storm Risk Management Section 203 Study; Draft Integrated Interim Feasibility Report and Environmental Impact Statement

The comments below identify analyses I urge the Draft to incorporate so that the report both reflects the full economic value at stake and supports the federal-interest determination on which a Section 203 recommendation depends. Each is framed as a discrete request for analysis.

I. ECONOMIC RESILIENCE AND REGIONAL SIGNIFICANCE

1. Economic resilience beyond avoided property damage. The National Economic Development account, as conventionally applied, captures avoided physical damages and emergency costs but understates the economic value at risk in a central business district of this scale. The Draft should populate the Regional Economic Development account with quantified business-interruption, employment, and output effects, and should address in the Other Social Effects account the effects this framework tends to omit as non-monetizable, tax-base stability, tenant and investor confidence, and Lower Manhattan's continued competitiveness as a global financial center. These are not soft considerations; they are the mechanism by which waterfront flooding becomes durable regional economic loss.

2. Transportation as economic infrastructure. The study area's ferries, subway tunnels, roadways, and pedestrian connections are not only assets to be protected but the systems through which the district functions economically.

The Draft should analyze how each alternative maintains the reliability of these networks during and after coastal storm events, including during deployable barrier closures and throughout the construction period and should treat transportation continuity as a direct determinant of economic resilience rather than a discrete resource category evaluated in isolation.

3. Cost effectiveness in light of other coastal regions. The Draft should situate its economic case within the established evidence that pre-disaster mitigation outperforms post disaster rebuilding. The National Institute of Building Sciences finds that federally funded mitigation returns on the order of six dollars for every dollar invested, with benefit-cost ratios ranging from roughly four to eleven to one depending on measure and hazard.

Gulf Coast practice bears this out at scale: in Louisiana and across the region, investment in protecting critical waterfront, transportation, and energy infrastructure ahead of an event has consistently proven less costly than replacing it afterward. The Draft's benefit analysis should reflect this avoided rebuilding logic explicitly.

4. Regional and national economic importance. The Draft should make explicit how protection of Lower Manhattan's financial district, transportation systems, and waterfront supports economic stability beyond the City, at the regional and national scale. The concentration of financial-sector activity, the metropolitan transportation systems that converge on the area, and the national exposure created by a disruption of this district are material to the determination of federal interest and should be characterized rather than assumed.

II. FEDERAL INTEREST AND TECHNICAL ANALYSIS

5. Federal-interest economics and cost-share. The Comprehensive Benefits Approach is described as a method but is not yet populated. Because a Section 203 recommendation turns on the economic case, the Draft should present rough order of magnitude cost ranges by alternative, a benefit cost framing tied to the National Economic Development account, and the federal and non federal cost share structure.

It should also disclose operations and maintenance cost and responsibility, ordinarily a non federal obligation carried in perpetuity and address the non federal sponsor's capacity to sustain both construction and long term O&M.

6. Long term adaptability and residual risk. The study area is delineated using the NYCPCC 90th percentile sea level rise projection for 2100, while the period of analysis runs to 2092. The Draft should reconcile this gap and describe how the preferred alternative can be raised, expanded, or otherwise modified over time if sea level rise exceeds current projections, ensuring today's investment remains effective for future generations. This should include the system's residual risk performance during an overtopping or design exceedance event.

7. Greenhouse gas and climate effects. Table 1 addresses air quality for criteria pollutants only. Given the project's purpose and the carbon objective and constraint already identified.
The Draft should add a methodology for construction and embodied greenhouse gas emissions and a qualitative climate effects discussion, compared across the final array.

8. Cumulative effects and segmentation. Adjacent projects (The Battery, Brooklyn Bridge Montgomery, South Battery Park City) are treated as tie ins, and FiDi FORGE is identified as part of the New York / New Jersey Harbor and Tributaries Study but not an early actionable element.

The Draft should include a cumulative effects analysis across the connected line of protection and a clear independent utility rationale explaining why FiDi FORGE is advanced separately from the harbor-wide study.

9. Interior drainage and combined-sewer performance. Perimeter coastal storm risk management systems characteristically shift risk to trapped stormwater and combined-sewer overflow behind the line of protection.
The Problems and Opportunities name this, but no dedicated methodology is provided.
The Draft should add an interior drainage and combined sewer overflow analysis assessing system performance during rainfall coincident and post closure conditions, beyond the pump station capacity referenced in the alternatives.

10. Construction phasing and business continuity. Implementation is anticipated from 2030 through 2041.

The Draft should describe construction phasing and sequencing by subarea, anticipated duration and any duration commitments, staging impacts (including barge mooring and work under FDR Drive), and a mitigation and community coordination approach that minimizes disruption to residents, small businesses, tourism, maritime operations, and daily commuters over a multi year build in a dense, occupied district.

11. Real estate and acquisition. The alternatives implicate the U.S. Coast Guard site, the Battery Maritime Building, and lands underwater, and a screened out approach turned on buyouts.

The Draft should include a real estate component identifying anticipated acquisitions, easements, and any relocations associated with each alternative.

12. Tribal consultation. The Section 106 framework identifies the SHPO, ACHP, and consulting parties but does not address tribal consultation, and no tribal nation appears among cooperating or participating agencies.
Given ground disturbing work along the lower Manhattan waterfront.

The Draft should document tribal consultation under Section 106 of the National Historic Preservation Act. Not just outreach meetings at the Museum.

13. Environmental justice and the deferred local review. Federal environmental justice requirements were rescinded in 2025 and CEQ's NEPA regulations have been removed from the Code of Federal Regulations, so I understand the absence of an EJ analysis to reflect current federal policy. I note, however, that the deferred CEQR and SEQR review will proceed under New York's Climate Leadership and Community Protection Act and applicable state requirements.

The Draft should ensure the demographic, displacement, and neighborhood character data it collects are sufficient to support that subsequent state and local analysis without rework.

III. TRANSPARENCY

14. Clear, side by side comparison of alternatives. The Draft should present the cost, benefits, environmental impacts, permitting considerations, and public access trade offs of each alternative in a clear, side by side format.

In particular, it should name the central trade off plainly an on land alternative that constrains waterfront access at lower cost against an in water alternative that preserves access at higher cost and greater permitting risk with the cost, access, and risk implications quantified so the comparison is legible to decision makers and the public alike.

Technical corrections, for the record: the Purpose and Need narrative dates the World Trade Center attacks to 2011 (should be 2001) and Hurricane Sandy to 2021 (should be 2012; the footnote is correct). Figures 3 and 4 carry an identical caption, though Figure 4 presents the study objective evaluation. These do not affect the substance but should be corrected before the Draft.

Thank you for the opportunity to comment.

From: BatterytoBridges <batterytobridges@gmail.com>
Sent on: Thursday, June 25, 2026 2:17
To: CENAN-FiDiFORGE-203-Study <CENAN-FiDiFORGE-203-Study@usace.army.mil>
Subject: [Non-DoD Source] FiDi FORGE EIS Scoping Public Testimony by Michael Kramer
Attachments: FiDi Forge BtoBC Public Testimony .pdf (141.11 KB)

Exit full screen

Dear Ms. Cheryl Alkemeyer,

I am submitting the full written version of the testimony that I delivered on 06.23.26 at the FiDi FORGE public hearing in an attachment below.

We look forward to working with our City and Federal partners on this project.

Sincerely,
Michael Kramer
President
Battery to Bridges Coalition, Inc. (a 501c3)
website: batterytobridges.org

info@batterytobridges.org
www.BatteryToBridges.org
P.O. Box115, NY, NY 10272

Testimony of Michael Kramer
President, Battery to Bridges Coalition, Inc.
FiDi FORGE Public Scoping Meeting
U.S. Army Corps of Engineers / NYCEDC
June 23, 2026

Good evening. My name is Michael Kramer, and I am President of the Battery to Bridges Coalition, Inc., a 501(c)(3) nonprofit organization advocating for a resilient, green, accessible, and community-serving East River waterfront from the Battery Maritime Building to Montgomery Street.

We appreciate the work of the U.S. Army Corps of Engineers, NYCEDC, and the City of New York in advancing the FiDi FORGE study and environmental review. We strongly support urgent coastal resilience for Lower Manhattan. This community has waited far too long since Hurricane Sandy for serious flood protection from storm surge, sea-level rise, and chronic flooding.

At the same time, support for resilience does not mean automatic support for every design choice. The purpose of this scoping process is to ask important questions early, before assumptions become locked in. We ask that the Environmental Impact Statement study reasonable alternatives, protect existing public assets, expand real public benefits, and give the community enough information to understand what is being proposed.

Our message is simple: Lower Manhattan needs flood protection, but it should also get a better waterfront. The project should protect residents, schools, businesses, public housing, historic resources, and critical infrastructure. It should also preserve public access, create usable open space, provide shade and seating, support recreation, respect the Seaport's maritime character, and serve the Financial District, Seaport, Two Bridges, Chinatown, and Lower East Side fairly. We also question the absence of the Seaport Coastal Resilience (SPCR) plan in this EIS study.

We respectfully ask that the EIS include the following seven items:

1. Study a "retain and adapt Pier 15" alternative. Pier 15 is a heavily used public waterfront asset that was rebuilt relatively recently. The public has not yet seen a clear explanation of why it must be demolished instead of adapted, elevated, partially floodable, or otherwise incorporated into the resilience design. If demolition is truly necessary, the EIS should explain why. If adaptation is possible, that option should be seriously studied.
2. Explain the purpose and need for Pier 19 when Pier 15 can be retained, who would use it, who would own or operate it, who would maintain it, and how it relates to the Historic South Street Seaport. If it is tied to deliveries, maritime operations, recreation, historic vessels, emergency access, or flood protection, those functions should be stated plainly. Back of the napkin says that at least $100M can be saved without this new pier.
3. Examine whether the proposed Piers 7 through 13 ferry terminals can then serve Blue Highway maritime freight delivery functions. If new ferry infrastructure is already being planned nearby, the EIS should analyze whether that investment can reduce the need for additional in-water construction elsewhere. The community should not be asked to

accept both demolition and new pier construction without a clear explanation of why existing or already-planned infrastructure cannot be used more efficiently.

4. Define the promised Seaport Recreation Center or comparable public-use facility. We support a resilient public facility near the former New Market Building footprint that could serve recreation, youth programming, maritime education, community use, and possibly athletic training. But a public benefit must be more than a concept. The EIS should identify the likely site, size, uses, funding path, public/private decision-making process, and timetable in our likely preferred Alternative Four (Medium Extension).
5. Study the Brooklyn Bridge shoreline as a public open-space opportunity. The area under the Brooklyn Bridge on the Manhattan side should not be treated as leftover space. The EIS should study whether a resilient beach, cove, ecological edge, or Gansevoort Peninsula-style public access amenity can be created safely, while also helping close the gap tooth between FiDi-Seaport and Brooklyn Bridge-Montgomery coastal resilience.
6. The approach for pedestrians and human powered transportation should be seamless between the end of the BMCR and the Seaport in the vicinity of the Brooklyn Bridge. We vigorously oppose construction of any wall that separates our communities.
7. Prepare a real maritime-use plan. This waterfront should not become only a flood wall with decoration on top. It should remain a working, civic, historic, educational, recreational, and maritime waterfront. The EIS should identify where historic, educational and emergency vessels, youth maritime programs, small craft, ecological monitoring, and other water-dependent uses can be preserved or expanded.
8. Provide clearer drawings, phasing, and construction information. The public needs understandable materials showing proposed platform edges, fill areas, pier removals, new pier construction, water depths, habitat impacts, public access points, maritime access, flood gates, construction phasing, temporary closures, and long-term maintenance responsibilities. A project of this scale cannot be meaningfully reviewed by the public or their elected officials through broad renderings and general assurances.

We also ask that the EIS make community engagement a real part of the decision-making process, and that the Battery to Bridges Coalition, consisting of residents, tenants, NYCHA communities, co-op and condominium owners, small businesses, maritime users, families, seniors, and waterfront visitors have a designated “seat at the table”, having meaningful opportunities to comment before major design decisions in and out of the water are finalized.

We offer these comments not as opposition to flood protection, but as conditions for public trust. We are not asking for delay. We are asking the EIS to test whether the proposed design is the most publicly beneficial way to achieve urgent resilience. We continue to urge NYCEDC and the public/private sector to fund interim steps to provide edge public spaces and uses that need not wait for 203 NEPA funding but are consistent with its goals.

The East River waterfront is not only an engineering problem. It is public open space, an historic district, a transportation corridor, a maritime asset, an ecological opportunity, and a once-in-a-generation chance to create a safer and more equitable Lower Manhattan waterfront.

We ask that the EIS reflect that full responsibility.

Thank you.

From: Jim Wright <jwbghmwk@pipeline.com>
Sent on: Thursday, June 25, 2026 6:43:16 PM
To: 'FiDi FORGE' <FiDiFORGE@edc.nyc>
CC: Weppler, Peter M CIV USARMY CENAN (USA) <Peter.M.Weppler@usace.army.mil>; McClanahan, Bethany M CIV USARMY CENAN (USA) <Bethany.M.Mcclanahan@usace.army.mil>
Subject: [Non-DoD Source] RE: Notice of Intent: FiDi FORGE

Exit full screen

Hello, Just a quick note on information on the EIS scope. I attended Tuesday's public hearing and was confused about the differences between the alternatives shown on the presentation boards and the alternatives shown in the slide presentation.

Since the Draft Scope is somewhat vague on this as well, I suggest that the slide presentation and presentation board graphics be posted on the FiDi FORGE website so it is clear what the public is being asked to comment on.

I look forward to continued engagement on this critical project for the future of Lower Manhattan and all of New York City.

Respectfully, Jim Wright
AIANY Transportation + Infrastructure Committee
Advocacy Director

From: FiDi FORGE <FiDiFORGE@edc.nyc>
Sent: Monday, June 01, 2026 2:29 PM
To: FiDi FORGE <FiDiFORGE@edc.nyc>
Cc: Peter.M.Weppler@usace.army.mil; McClanahan, Bethany M CIV USARMY CENAN (USA) <bethany.m.mcclanahan@usace.army.mil>
Subject: Notice of Intent: FiDi FORGE

Notice of Intent to Prepare a Draft Integrated Interim Feasibility Report and Environmental Impact Statement
Financial District and Seaport Fortifying Our Resilient Growth and Economy (FiDi FORGE)
Coastal Storm Risk Management Section 203 Study

NOI

The U.S. Army Corps of Engineers (USACE), New York District (District), in coordination with the non-federal interest, New York City Economic Development Corporation (NYCEDC) is undertaking a feasibility study to examine measures to manage future flood risk and reduce the economic costs and risks associated with flood and storm events that are affecting the Financial District and Seaport study area under the authority provided by the U.S. Congress in Section 203 of the Water Resources Development Act (WRDA) of 1986, as amended. Under Section 203, NYCEDC intends to prepare a Draft Integrated Interim Feasibility Report and Environmental Impact Statement (EIS) in compliance with the National Environmental Policy Act (NEPA) and the Department of Defense National Environmental Policy Act Implementing Procedures (June 30, 2025).

The study area is approximately 0.9 miles of the East River waterfront in Lower Manhattan, New York County, New York and is located within the ongoing New York and New Jersey Harbor and Tributaries (NYNJHATS) Coastal Storm Risk Management (CSRM) Feasibility Study. The purpose of the study is to minimize the current and future coastal storm flood risk to the FiDi FORGE study

From: Jason Wu <jason.stephen.wu@gmail.com>
Sent on: Monday, June 29, 2026 3:49:32 AM
To: CENAN-FiDiFORGE-203-Study <CENAN-FiDiFORGE-203-Study@usace.army.mil>
Subject: [Non-DoD Source] Formal Comment

Exit full screen

Hi!

I'm writing this to bring attention to a recent paper which finds that many of the world's sea level rise estimates are inaccurate due to a crucial oversight in most prior research on the topic. I've linked the paper below.

Although the inaccuracies in sea level rise estimates are associated with locations in the Global South, I encourage the people working to fortify FiDi against climate change to consider the implications of this finding for both ongoing and future NYC coastal fortification projects.

https://www.nature.com/articles/s41586-026-10196-1

Jason Wu

Outlook

[Non-DoD Source] FiDi FORGE Public Comment Letter

From Martine Johannessen <martine@mcb1.nyc>
Date Wed 7/1/2026 8:36 AM
To CENAN-FiDiFORGE-203-Study <CENAN-FiDiFORGE-203-Study@usace.army.mil>
Cc Alice Blank <aliceblankcb1@gmail.com>; tmeltzernyc <tmeltzernyc@gmail.com>; Zach Bommer <zacbommer@cb.nyc.gov>

1 attachment (745 KB)
MCB1 Resolution on FiDi FORGE EIS.pdf;

Dear USACE and NYCEDC,

Thank you for the opportunity to comment on the FiDi FORGE EIS Draft Scope of Work and Integrated Feasibility Report. I am submitting a resolution passed by Manhattan Community Board 1 that outlines the community board's questions, concerns, and priorities for scoping. Please reach out with any questions.

Thank you,
Martine

The City of New York
Manhattan Community Board 1
Tammy Meltzer CHAIRPERSON | **Zach Bommer** DISTRICT MANAGER

COMMUNITY BOARD 1 – MANHATTAN
RESOLUTION

DATE: JUNE 25, 2026

COMMITTEE OF ORIGIN: ENVIRONMENTAL PROTECTION

COMMITTEE VOTE:	10 In Favor	0 Opposed	0 Abstained	0 Recused
PUBLIC VOTE:	1 In Favor	0 Opposed	0 Abstained	0 Recused
BOARD VOTE:	37 In Favor	2 Opposed	0 Abstained	0 Recused

RE: **Public Scoping Phase on FiDi FORGE EIS and Integrated Feasibility Report**



FiDi FORGE Study Area

WHEREAS: The Financial District and Seaport neighborhoods in Lower Manhattan face increasing risks from climate change including sea level rise, coastal flooding, and intensifying coastal storms; and

WHEREAS: Climate resilience planning has occurred for many years in Lower Manhattan with extensive community input, resulting in plans such as the Financial District and Seaport Climate Resilience Master Plan and adjacent resilience plans for Battery Park City, the Battery and Brooklyn Bridge-Montgomery waterfront, which together form the Lower Manhattan Coastal Resiliency strategy; and

WHEREAS: The FiDi Seaport Climate Resilience Master Plan (FDSCRMP) covers the FiDi FORGE area, a 0.9 mile stretch of Lower Manhattan's East River waterfront from the Battery to the Brooklyn Bridge;

WHEREAS: The FDSCRMP was originally released in 2021, and has three goals directly stated in the report:

1. Protect Lower Manhattan from daily tidal flooding and coastal storms
2. Integrate climate resilience infrastructure into the city

3. Enhance the public waterfront experience by creating new public open spaces and community-serving uses that are universally accessible; and

WHEREAS: FDSCRMP was most recently updated through a report released by NYCEDC in November 2025, which provides details on design and implementation strategies to achieve its three goals, including finalizing the in-water footprint for the project; and

WHEREAS: MCB1 was consulted by NYCEDC during the development of the FDSCRMP and MCB1 passed multiple resolutions between 2020 and 2026 providing feedback on how to improve the master plan and its subsequent updates (see footnotes 1-6 in MCB1's March 2025 resolution for list of resolutions); and

WHEREAS: MCB1 most recently passed a resolution in March 2026 providing feedback on the November 2025 report, emphasizing the importance of maximizing high quality public open space and public access to the waterfront, expanding community programming, strengthening the capacity of flood infrastructure, integrating new climate resilient infrastructure into the surrounding neighborhood, strengthening ecological resilience, protecting maritime infrastructure, maritime uses, and existing piers, and more; and

WHEREAS: The U.S. Army Corps of Engineers (USACE) and the New York City Economic Development Corporation (NYCEDC) recently took an important step toward implementing the FDSCRMP for FiDi FORGE; and

WHEREAS: USACE and NYCEDC are partnering to bring the FDSCRMP into compliance with the National Environmental Policy Act (NEPA), which could unlock federal funding to cover up to 65 percent of eligible construction costs; and

WHEREAS: Compliance with NEPA requires the completion of a Section 203 Integrated Interim Feasibility Report for a Coastal Storm Risk Management Study and an associated Environmental Impact Statement (EIS); and

WHEREAS: The EIS is currently in the public scoping phase; and

WHEREAS: MCB1 supports efforts to fund and implement the FDSCRMP and transform FiDi FORGE area into a publicly accessible, climate resilient waterfront, but have concerns about the methodologies and issues to be addressed in the EIS including:

- **General Concerns**
  - Missing important context of previous environmental review processes that have occurred in and around this area for climate mitigation projects, and the lessons learned from these processes (e.g., East Side Coastal Resiliency project, Battery Park City Resiliency project)
  - Missing review of how the USACE Harbor and Tributary studies will inform and impact these plans

    - Despite reference to nearby resilience projects, missing discussion of how this project would integrate into other resilience efforts, or existing urban designs or plans for the neighborhood
- **Projects Included in All Alternatives (p. 7)**
    - The Seaport Coastal Resilience Project is a critical element of resilience planning in the FiDi FORGE area, but it is explicitly excluded from the Integrated Interim Feasibility Report
        - The Draft Scope of Work does not describe the impacts this exclusion may have on the EIS and Feasibility Report, and how the EIS will address this notable gap
- **Goals and Objectives (p. 9)**
    - Although this EIS process is framed as a step towards implementing the FDSCRMP, the FDSCRMP is hardly referenced throughout the report
    - The goals and objectives outlined in the Draft Scope of Work do not align with the goals of the FDSCRMP, or expressed community priorities for climate mitigation infrastructure
    - Notably absent from the goals are the expansion of high quality public open space, integration of FiDi FORGE into the surrounding neighborhood and existing urban plans, and strengthened ecological resilience
- **Screening of Approaches to Reach the Final Array of Alternatives (p. 13-16)**
    - The EIS proposes five alternative approaches under consideration for analysis: *Approach 1 (No Action), Approach 2 (Non-Structural), Approach 3 (Structural On Land), Approach 4 (Structural In Water), and Approach 5 (Engineering with Nature)*
    - The scoring system for how each of the five approaches are evaluated and thus *included* or *excluded* from the EIS scope of work is extremely vague, bordering on absent
        - There is no information on what constitutes a "low," "medium," or "high" score in the P&G Evaluation or Evaluation of Alternatives Against Project Objective Metrics arrays, which makes it difficult to understand why each approach is included or excluded from analysis
- **Final Array of Alternatives to be Considered Further and Evaluated in the EIS (p. 17-19)**
    - Although the EIS process is framed as a next step to implement the FiDi Seaport Climate Resilience Master Plan, the five alternatives under consideration do not clearly align with the strategies outlined in the FDSCRMP
        - Unlike the FDSCRMP, the five proposed thematic approaches create unrealistic and unnecessary boundaries that pit complementary strategies against one another, rather than treating them as important components of an integrated climate resilience strategy (e.g., *Engineering*

with Nature is separated from a *Structural on Water or Structural on Land approach*)

- ***Approach 3 (Structural on Land)***
  - As currently described, *Approach 3 (Structural on Land)* would close off public access to key portions of the waterfront, which is directly at odds with the FDSCRMP, NYC's Waterfront Revitalization Program (WRP), and MCB1's most recent resolution from March 2026, which emphasized the critical importance of expanding publicly accessible waterfront
  - Unclear how this approach aligns with the designs proposed in the FDSCRMP (if at all) *or* the full extent of climate resilient infrastructure and public green space needed in this area
  - Further analysis of this approach (as defined in the EIS) may send NYC down a path away from needed flood protection and publicly accessible open space
- ***Approach 4 (Structural on Water)***
  - Appears to align most closely with the designs approved in the FDSCRMP, but excludes elements of the *Non-Structural, Structural on Land* and *Engineering with Nature* that may complement one another to capture the designs proposed in the FDSCRMP
  - Unclear how the two suboptions for *Structural on Water: Alternative 4 (Medium Extension)* and *Alternative 4A (Narrow Extension)* align with the designs proposed in the FDSCRMP
  - As currently described, *Alternative 4A (Narrow Extension)* would create "inaccessible green space on the wet and dry sides of the floodwall," directly at odds with the goals of the FDSCRMP, NYC's Waterfront Revitalization Program (WRP), and MCB1's most recent resolution from March 2026, which emphasized the critical importance of expanding publicly accessible waterfront in FiDi FORGE
- ***Approach 5 (Engineering with Nature)***
  - Screened out of the analysis in final array, despite nature-based solutions and ecological enhancement being explicitly included in the FDSCRMP and prioritized by MCB1 as an essential element of climate resilience and high quality public green space (see also MCB1 March 2025 resolution emphasizing importance of nature-based strategies)
  - Currently unclear how *"Engineering with Nature"* strategies may or may not be incorporated into the EIS (*"Engineering with Nature measures may be included as appropriate with the structural alternatives,*" p. 18)

- **Comprehensive Benefits Approach (p. 18)**
    - MCB1 understands the need to analyze the economic, environmental, and social benefits of each climate resilience strategy, but it is unclear how each of the four categories of analysis – National Economic Development, Regional Economic Development, Environmental Quality, and Other Social Effects – will be weighed against one another in the final EIS analysis and recommendations
- **Anticipated Potential Environmental Effects (p. 19-28)**
    - **Water Quality and Stormwater Management and Infrastructure**
        - Current language is vague and seems to focus on the potential impacts of each scenario to *existing* stormwater infrastructure, rather than the improvements and expanded capacity that each approach would offer
        - Given that expanded stormwater and flood infrastructure is a primary goal of the FDSCRMP, the EIS should also analyze how each approach will improve the capacity of stormwater / flood infrastructure
        - Unclear what climate scenarios and timeframes will be analyzed when comparing approaches to flood mitigation (e.g., with worsening climate conditions, protection using the projected 50-year floodplain, 100-year floodplain, 200-year floodplain, etc.)
    - **Recreation, Parklands, and Open Space**
        - Current language is vague and focuses on the impacts of each approach on *existing* recreational, open space, and public use areas
        - Given that expanded publicly accessible waterfront and open space is a primary goal of the FDSCRMP, Waterfront Revitalization Program and MCB1, the EIS should analyze how each of the proposals will improve access to new and/or improved recreation, parklands, and open space
    - **Transportation**
        - Lack of clarity on how EIS would analyze impacts to *existing* transportation methods
        - Does not offer any strategy for analyzing the transportation improvements and benefits each approach would deliver
        - MCB1 has already established that any resilience plan for this area "must enhance transportation access to and from Lower Manhattan for all modes of transit, including ferry, subway, bus, bicycle, and pedestrian," thus an analysis of transportation benefits is critical
    - **Navigation**

        - Proposed analysis is vague, particularly with regards to ferry impacts, and does not include discussion of emergency maritime access
    - **Socioeconomic**
        - Unclear definition of how "displacement" will be analyzed (e.g., direct or indirect displacement)
        - No explicit discussion of impacts on low-income neighbors and other vulnerable populations (e.g., NYCHA residents at the nearby Alfred E. Smith Houses)
    - **Visual Resources**
        - Unclear how iconic views, visual corridors, and character-defining elements of the landscape will be identified in order to protect visual resources
    - **Construction Impacts**
        - Construction impacts are likely to be significant and long-lasting for the projected eleven year construction timeframe from 2030 to 2041, however discussion of these impacts is vague and dispersed throughout multiple categories
        - No specific reference to the public health impacts of lower air quality due to construction dust, traffic, construction equipment, and other stationary sources of pollution
    - **Ecological Impacts / Natural Resources**
        - Ecological impacts are dispersed throughout multiple categories including Water Resources, Aquatic Biota, Terrestrial Natural Resources, and others
        - No discussion of opportunities for habitat restoration or ecological enhancement
    - **Cumulative Public Benefits & Equity Impacts**
        - Public benefits such as new open space, flood protection, community programming, and equitable access to these benefits are critical to the success of any climate resilient infrastructure project
        - These benefits are dispersed throughout multiple categories and only vaguely addressed in the proposed Scope of Work

THEREFORE BE IT RESOLVED THAT: MCB1 affirms the importance of developing climate resilient infrastructure in Lower Manhattan, and in particular in the FiDi FORGE area, to deliver new public open space, safeguard low-lying neighborhoods from the impacts of coastal storms, and protect ferry and transit hubs; and

BE IT FURTHER RESOLVED THAT: Any approaches studied in the FiDi FORGE EIS should prioritize expanded high quality public green space and public access to the waterfront, strengthened flood protection, increased ecological resilience, community programming, and integration of the project into the surrounding city, established resilience and other plans; and

BE IT FURTHER RESOLVED THAT: Any analysis completed through the FiDi FORGE EIS and feasibility study, and any federal funding secured as a result, should support the implementation of the Financial District and Seaport Climate Resilience Master Plan (FDSCRMP) and address community concerns (e.g., MCB1's March 2026 Resolution), rather than pursue inferior alternatives that only partially deliver on these established goals and priorities; and

BE IT FURTHER RESOLVED THAT: MCB1 calls upon NYCEDC and USACE to ensure that the EIS completes the baseline analyses already outlined in the Draft Scope of Work, *and* directly addresses each of the concerns raised in the final "Whereas" statement above, with *additional specificity* added below:

- **General Concerns**
  - Contextualize this particular EIS process by including a history and lessons learned from previous environmental review processes that have occurred around this area for climate resilient projects (e.g., the East Side Coastal Resiliency process highlighting that access to public space is an integral part of successful climate resilient infrastructure)
  - Describe how the USACE Harbor and Tributary studies will inform and impact these plans
- **Projects Included in All Alternatives (p. 7)**
  - Clarify how the exclusion of the Seaport Coastal Resilience Project will impact the EIS, and propose strategies to bridge this gap in analysis
- **Goals and Objectives (p. 9)**
  - Tie EIS goals and objectives to goals outlined in the FDSCRMP and priorities raised repeatedly by MCB1 and concerned members of the public
    - Include creation of new high quality public open space and increased public uses of, and access to, the waterfront from both land and water

        - Include integration of new development into surrounding neighborhoods and existing urban plans
        - Include expanded biodiversity and ecological resilience
- **Screening of Approaches to Reach the Final Array of Alternatives (p. 13-16)**
    - Clarify the criteria for how each of the five approaches are evaluated for the P&G Evaluation table and Evaluation of Alternatives Against Project Objective Metrics table
    - Clarify what constitutes a "low," "medium," or "high" score in each of these arrays
    - Ensure the calculations and analyses to evaluate "cost-effectiveness" (per the USACE principles and guidelines criteria) prioritize the comprehensive long-term future operating and capital expenditure costs to maintain a state of good repair, and do not only consider the short-term initial capital construction cost
- **Final Array of Alternatives to be Considered Further and Evaluated in the EIS (p. 17-19)**
    - Reference the FiDi Seaport Climate Resilience Master Plan throughout the report, in particular when outlining the range of alternative approaches to be studied in the EIS
        - Align alternative approaches under consideration for study to the goals and approaches already outlined in the FDSCRMP, rather than introducing siloed "thematic" approaches
    - Restructure approaches to prioritize deeper analysis of *Approach 4 (Structural over Water),* focused on sub-options that align with FDSCRMP designs and goals
        - Integrate essential elements of *Approach 2 (Non-Structural), Approach 3 (Structural On Land),* and *Approach 5 (Engineering with Nature)*
    - Clarify how *Approach 5 (Engineering with Nature)* will or will not be included in structural analyses
    - Augment structural on water approaches with nature-based solutions wherever possible to improve public green space and local ecology
- **Comprehensive Benefits Approach (p. 18)**
    - Clearly articulate how National Economic Development, Regional Economic Development, Environmental Quality, and Other Social Effects will be weighed against one another in the final EIS analysis and recommendations
- **Anticipated Potential Environmental Effects (p. 19-28)**
    - MCB1 strongly urges NYCEDC to ensure that the EIS not only analyzes impacts of each approach on *existing* infrastructure, public resources, and communities, but clearly analyzes the benefits that each approach *would* deliver

        - Analyzing the anticipated benefits of each approach is essential to identifying which option best delivers on FDSCRMP's three goals: (1) protect Lower Manhattan from tidal flooding and coastal storms (2) integrate climate resilience infrastructure into the city (3) enhance the public waterfront by creating open spaces
    - **Water Quality and Stormwater Management and Infrastructure**
        - Quantitatively and qualitatively analyze how each approach will *improve* stormwater management and the capacity of flood infrastructure (e.g., volume of stormwater managed, number of pump stations, reduction in Combined Sewage Overflow events, acres of inland floodplain removed from 100-year floodplain, risk of overtopping or failure)
        - Analyze alternative approaches under multiple sea-level-rise scenarios, looking at their ability to adapt if climate projections worsen, as well as their anticipated performance beyond 2100
    - **Recreation, Parklands, and Open Space**
        - Quantitatively and qualitatively measure how each of the proposals will *improve and expand* access to new recreation space, parklands, and open space, analyzing both quantity and quality of new public space (e.g., increase in square footage of public open space, increase in permeable surfaces, increase in shade cover/tree canopy, increase in linear feet of living shoreline)
            - Include analysis of year-round accessibility, connections to existing waterfront parks and esplanades, accessibility for seniors and people with disabilities, recreational opportunities and programming
            - Include opportunities for habitat restoration and ecological enhancement
    - **Transportation**
        - Analyze impacts to capacity of *existing* transportation methods across all modes of transit including but not limited to ferry, subway, private vehicles, for-hire vehicles, trucks, bus, bicycle, and pedestrian
        - Analyze the transportation *improvements* and *benefits* each approach would deliver for all modes of transportation
        - Analyze construction truck routes and traffic impacts (also see Construction Impacts)
    - **Navigation**
        - Analyze impacts to ferry operations during and after construction, impacts to emergency maritime access in case

of climate emergency or other disaster, impacts on waterborne transportation
        - Analyze future adaptability of existing and modified ferry landings to sea level rise
    - **Socioeconomic**
        - Analyze both direct and indirect displacement as a result of the proposed alternatives, including analysis of impacts to low-income neighbors (e.g., NYCHA residents at the nearby Alfred E. Smith Houses)
    - **Visual Resources**
        - Conduct public outreach sessions to ensure that members of the public are involved in the process of protecting visual resources (e.g., identify important and iconic views and visual corridors)
        - Ensure protection of visual corridors to and from historic sites/areas
    - **Construction Impacts**
        - Create a new category that consolidates relevant information across EIS categories regarding construction impacts (e.g., noise and vibration, air quality, transportation), plus any additional construction impacts that are not already identified in existing categories
            - Analyze impacts of truck traffic routes through FiDi and the Seaport
            - Ensure analysis considers impacts to residents, workers, schools, businesses and tourists during what will likely be a decade-long construction effort
        - Provide detailed analysis of construction duration and phasing over projected 2030 to 2041 construction timeframe
        - Analyze public health impacts of construction impacts on surrounding communities (i.e., from noise, vibration, decreased air quality due to construction dust, emissions from construction equipment, trucks, etc.)
        - Ensure EIS analysis includes clear and actionable mitigation strategies to address each construction impact, integrating best practices from other large-scale construction projects in this area
    - **Ecological Impacts / Natural Resources**
        - Create a new category that consolidates relevant information across the EIS categories regarding the ecological impacts of each approach including but not limited to: impacts to fish habitat, water quality, tidal flows and currents, etc.
        - Identify and propose opportunities for habitat restoration and ecological enhancement through each approach

- **Public Benefits & Equity Impacts**
  - Create a new category that consolidates relevant information across the EIS categories regarding the anticipated public benefits of each approach (e.g., amount of accessible waterfront/recreational space, community programming, properties removed from 100-year floodplain)
  - Analyze and explain who will benefit from the new public spaces under each approach
  - Explain how new programming will serve residents as well as workers and tourists
  - Outline a plan for long-term maintenance and governance of the new waterfront

Outlook

Fw: [Non-DoD Source] Fwd: Additional Scoping Meeting and Scoping Period Extension for FiDi FORGE

From Peterson, Casey <casey.peterson@arcadis.com>
Date Wed 7/15/2026 11:29 AM
To Mendez, Ellerbe <ellerbe.mendez@arcadis.com>

From: Weppler, Peter M CIV USARMY CENAN (USA) <Peter.M.Weppler@usace.army.mil> on behalf of CENAN-FiDiFORGE-203-Study <CENAN-FiDiFORGE-203-Study@usace.army.mil>
Sent: Tuesday, July 7, 2026 11:04 AM
To: fidiforge@edc.nyc <fidiforge@edc.nyc>; Alexis Taylor <ataylor@edc.nyc>; Peterson, Casey <casey.peterson@arcadis.com>
Subject: FW: [Non-DoD Source] Fwd: Additional Scoping Meeting and Scoping Period Extension for FiDi FORGE

You don't often get email from cenan-fidiforge-203-study@usace.army.mil. Learn why this is important

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Fyi

Peter Weppler
Chief, Environmental Analysis Branch
U.S. Army Corps of Engineers – NY
Planning - c/o PSC Mail Center
(Room 17-420)
26 Federal Plaza
New York, NY 10278-0090
250 years
Peter.M.Weppler@usace.army.mil
917-790-8634
917-620-2862

From: Chelsea Albucher <calbucher@gmail.com>
Sent: Thursday, July 2, 2026 10:50 AM
To: CENAN-FiDiFORGE-203-Study <CENAN-FiDiFORGE-203-Study@usace.army.mil>
Subject: [Non-DoD Source] Fwd: Additional Scoping Meeting and Scoping Period Extension for FiDi FORGE

Hello, Please see my comment below. I know it is very general, the gist is, please consider engaging Staten Island stakeholders, and please advocate/pursue additional work to strengthen Staten Island's resilience and potential.

---------- Forwarded message ---------
From: **Chelsea Albucher** <calbucher@gmail.com>
Date: Thu, Jul 2, 2026 at 10:46 AM
Subject: Fwd: Additional Scoping Meeting and Scoping Period Extension for FiDi FORGE
To: <stgeorgecivic@gmail.com>, Janos Marton <janosdmarton@gmail.com>, Kelly Vilar <kelly@siurbancenter.org>, Michelle Bascome <michelle@sinfpa.org>, Rob Grosso <rob@sinfpa.org>

FYI - See below. Army Corps of Engineers with NYEDC is preparing an Resiliency EIS/FS for FiDi . . . July 17th virtual presentation . . . Staten relevance includes, but not limited to, our transportation and employment hubs, workforce opportunities, and equitable distribution of funding . . . as Battery Park and Fidi advance their planning, they become more and more competitive for implementation funding, which is great, but can leave the rest of us further behind.

---------- Forwarded message ---------
From: **FiDi FORGE** <FiDiFORGE@edc.nyc>
Date: Wed, Jul 1, 2026 at 4:40 PM
Subject: Additional Scoping Meeting and Scoping Period Extension for FiDi FORGE
To:
Cc: Weppler, Peter M CIV USARMY CENAN (USA) <Peter.M.Weppler@usace.army.mil>, McClanahan, Bethany M CIV USARMY CENAN (USA) <Bethany.M.Mcclanahan@usace.army.mil>, FiDi FORGE <FiDiFORGE@edc.nyc>

Announcement of Additional Scoping Meeting and Scoping Period Extension for Draft Integrated Interim Feasibility Report and Environmental Impact Statement
Financial District and Seaport Fortifying Our Resilient Growth and Economy
(FiDi FORGE)
Coastal Storm Risk Management Section 203 Study

The U.S. Army Corps of Engineers (USACE), New York District (District), in coordination with the non-federal interest, New York City Economic Development Corporation (NYCEDC) is undertaking a feasibility study to examine measures to manage future flood risk and reduce the economic costs and risks associated with flood and storm events that are affecting the Financial District and Seaport study area under the authority provided by the U.S. Congress in Section 203 of the Water Resources Development Act (WRDA) of 1986, as amended. Under Section 203, NYCEDC intends to prepare a Draft Integrated Interim Feasibility Report and Environmental Impact Statement (EIS) in compliance with the National Environmental Policy Act (NEPA) and the Department of War National Environmental Policy Act Implementing Procedures (April 30, 2026).

The study area is approximately 0.9 miles of the East River waterfront in Lower Manhattan, New York County, New York and is located within the ongoing New York and New Jersey Harbor and Tributaries (NYNJHATS) Coastal Storm Risk Management (CSRM) Feasibility Study. The purpose of the study is to minimize the current and future coastal storm flood risk to the FiDi FORGE study area of Lower Manhattan by creating a coastal storm risk management system integrated within the neighborhoods

Outlook

Fw: Request for meeting to discuss FiDi FORGE

From Peterson, Casey <casey.peterson@arcadis.com>
Date Wed 7/15/2026 11:29 AM
To Mendez, Ellerbe <ellerbe.mendez@arcadis.com>

From: Weppler, Peter M CIV USARMY CENAN (USA) <Peter.M.Weppler@usace.army.mil>
Sent: Thursday, July 2, 2026 1:11 PM
To: Peterson, Casey <casey.peterson@arcadis.com>; CENAN-FiDiFORGE-203-Study <CENAN-FiDiFORGE-203-Study@usace.army.mil>; FiDiFORGE@edc.nyc <fidiforge@edc.nyc>
Subject: FW: Request for meeting to discuss FiDi FORGE

Arcadis Warning: Exercise caution with email messages from external sources such as this message. Always verify the sender and avoid clicking on links or scanning QR codes unless certain of their authenticity.

Forwarding to Study Inbox

Peter

Peter Weppler
Chief, Environmental Analysis Branch
U.S. Army Corps of Engineers – NY
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(Room 17-420)
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From: Robert Freudenberg <RobertF@RPA.ORG>
Sent: Thursday, July 2, 2026 1:04 PM
To: Alexis Taylor <ataylor@edc.nyc>; Weppler, Peter M CIV USARMY CENAN (USA) <Peter.M.Weppler@usace.army.mil>
Cc: pag57@columbia.edu; tbrown@riverkeeper.org; eruby@riverkeeper.org; mdulong@riverkeeper.org; dgamils@riverkeeper.org; Michelle Luebke <michelle@swimmablenyc.org>; Victoria Sanders <victoria@nyc-eja.org>; ghs2132@columbia.edu; Tyler Taba <ttaba@waterfrontalliance.org>; Ravena Pernanand

<ravena@rpa.org>
Subject: [Non-DoD Source] Request for meeting to discuss FiDi FORGE

Dear Alexis and Peter,

On behalf of the undesigned organizations, representing a self-selected segment of the Rise to Resilience (R2R) Coalition, I am respectfully requesting a meeting to discuss our concerns and questions regarding the FiDi FORGE EIS Scoping. We understand that public comments are currently being accepted and that there is one additional public engagement session, but we are seeking clarity on some of the decisions already made and the assumptions that went into making them, as well as additional information about the project's potential environmental impacts. We would appreciate the opportunity to discuss these issues with you further before the submission deadline to help inform our comments.

Please let us know what date and time might work for a virtual or in-person meeting to discuss the issues below. Many thanks.

Issues/Questions to be Discussed

1. Aside from the EIS scoping document, is there any other publicly available information regarding the project's alternatives and criteria/methodology/assumptions used to analyze, compare, and identify the chosen alternatives, and, to establish a proposed scope for the evaluation of the project's environmental impacts? Gaining a deeper understanding of what was learned and how that knowledge was used to choose/screen out alternatives, as well as knowing the project sponsor's specific plans for evaluating environmental impacts, is essential to the process of evaluating the project and submitting full and complete public comments on it.
2. Specifically we are interested in learning more about the cost/cost-effectiveness differences between each alternative (and sub-alternatives), any initial environmental analyses for each alternative (including more information about the fill for Alternatives 4 and 4a (volume of fill required for each, degree of habitat loss, potential mitigation, etc.), the scope of intended environmental impact analyses, and a better understanding of which maritime features are intended to be preserved, and which maritime features would be lost in Alternative 5 and why such loss led to Alternative 5 being screened out.
3. Finally, each alternative is set up to be entirely distinct from one another. While there is some mention that natural features (as represented in Alternative 5) could be integrated with the other alternatives, we wonder why there isn't more of a hybrid alternative that takes the best features of each alternative and uses them where most appropriate? For example, rather than screen out Alternative 5, why couldn't an alternative be developed that is largely nature-based, but incorporates features of Alternative 3 and/or 4 in those areas where NBFs fall short or preclude other important uses (i.e., transportation/maritime)? We think such an alternative might be a more realistic one to evaluate versus Alternative 3, which seems largely infeasible, and that by screening out Alternative 5, the opportunity for nature-based features is significantly diminished.

The information provided at this time is inadequate for our organizations to develop thorough comments on the scope. The lack of information on environmental impacts is concerning.

Thanks for considering our requests for information and the opportunity to meet. We look forward to discussing these issues with you.

All the best,

Rob Freudenberg, RPA, on behalf of Riverkeeper, Waterfront Alliance, Columbia University's Resilient Coastal Communities Project, and SWIM Coalition

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
GREATER ATLANTIC REGIONAL FISHERIES OFFICE
55 Great Republic Drive
Gloucester, MA 01930

July 7, 2026

Peter Weppler, Chief
Environmental Analysis Branch
New York District
U.S. Army Corps of Engineers
26 Federal Plaza
New York, NY 10278-0900

Re: Invitation to be a Cooperating Agency for the Draft Integrated Interim Feasibility Report and Environmental Impact Statement for the FiDi FORGE Coastal Storm Risk Management Section 203 Study

Dear Mr. Weppler:

Thank you for your June 25, 2026, letter inviting us to be a cooperating agency under the National Environmental Policy Act (NEPA) for the environmental review associated Financial District: Fortifying Our Resilient Growth & Economy (FiDi FORGE) Draft Integrated Interim Feasibility Report and Environmental Impact Statement (FR/EIS). The U.S. Army Corps of Engineers (USACE), New York District (District), in partnership with the New York City Economic Development Corporation (NYCEDC) and acting as the non-federal project sponsor for the City of New York, are partnering to investigate the feasibility of managing coastal storm risk in Lower Manhattan within the Financial District and South Street Seaport and surrounding areas. The study will evaluate coastal storm risk management measures for approximately 0.9 miles of the Lower Manhattan and East River waterfront from the Brooklyn Bridge to The Battery. We accept your invitation to participate as a cooperating agency to help foster a collaborative process and interagency coordination on this project.

The project area, including the East and Hudson Rivers are designated as essential fish habitat (EFH) for federally managed species under the Magnuson-Stevens Fishery Conservation and Management Act (MSA). Federal agencies are required to consult with us on all actions or proposed actions authorized, funded, or undertaken by the agency that may adversely affect EFH. The rivers also provide habitat for a wide variety of aquatic species such as diadromous fishes and shellfish we seek to conserve and enhance under the Fish and Wildlife Coordination Act (FWCA). Under the FWCA, federal agencies are required to consult with us to conserve wildlife resources by preventing their loss or and damage, as well as providing for the development and improvement of those resources. Federally-listed resources under the Endangered Species Act (ESA) may also be present in the study area. If the lead federal action agency determines that the proposed action may affect threatened or endangered species, or designated critical habitat under the ESA, the agency is required to conduct a consultation under section 7 of the ESA.

Because our role and degree of involvement as a cooperating agency is dependent on existing staff and fiscal resources, our contribution to the process will be limited to participating in

project meetings and providing written comments in response to your documents prepared as part of the NEPA process. We will provide technical information identifying aquatic species and habitats of concern, identification of issues to be considered and evaluated during the NEPA process and guidance on evaluating, avoiding and minimizing project effects to our trust resources. We are unable to undertake any data collection, conduct analyses or to prepare any sections of the NEPA documents as our staff and resources are fully committed to other obligatory programs of NOAA's National Marine Fisheries Service.

Please note that our involvement as a cooperating agency does not constitute an endorsement of this project, nor does it obviate the need for consultations required under the MSA, FWCA, and the ESA. As project design moves forward, should adverse impacts to EFH or other NOAA trust resources be anticipated, consultation with us under the Section 305(b) of MSA and/or FWCA is required. Similarly, potential impacts to our species protected under the ESA should be coordinated with our Protected Resources Division.

Thank you for the opportunity to participate as a cooperating agency on this project. We look forward to continued coordination as the FiDi FORGE coastal storm risk management project moves forward. If you have any questions regarding this matter, please contact Jessie Murray with our Habitat and Ecosystem Services Division at (732) 872-3116 or jessie.murray@noaa.gov for information regarding essential fish habitat consultations; or Edith Carson-Supino with our Protected Resources Division at (978) 282-8490 or edith.carson-supino@noaa.gov for information regarding ESA consultations.

Sincerely,



Louis A. Chiarella
Assistant Regional Administrator
for Habitat and Ecosystem Services

cc:
Christine Vaccaro, NMFS PRD
Alessia Brugnara, NMFS PRD
Jessie Murray, NMFS HESD
Dale Youngkin, NMFS OPR
Timothy Cardiasmenos, NMFS GAR

From: Mitchell Grubler <mitchellgrubler@yahoo.com>
Sent on: Saturday, July 11, 2026 4:09:58 PM
To: CENAN-FiDiFORGE-203-Study <CEN[Exit full screen]tudy@usace.army.mil>
Subject: [Non-DoD Source] Section 203 study and Environmental Impact Statement, FiDi FORGE

As a Lower Manhattan resident I expect FiDi FORGE to provide real flood protection, meaningful public access, and a waterfront that serves the people who live here. More specifically it needs to:
* Protect residents, schools, businesses, public housing, and critical infrastructure from flooding.
* Preserve and improve public waterfront access.
* Ensure that resiliency infrastructure also creates usable parks, shade, seating, recreation, and community space.
* Avoid blank walls, barriers, or designs that cut neighborhoods off from the East River.
* Protect the Seaport's historic character and neighborhood life.
* Make sure the benefits are shared fairly among Financial District, Seaport, Two Bridges, Chinatown, and Lower East Side communities.
* Require meaningful community engagement before major design decisions are finalized.
* Preserve and improve public and maritime waterfront access.

Mitchell Grubler
20 Confucius Plaza, Apt. 40C
New York, NY 10002

From: John Campo <campocat@gmail.com>
Sent on: Saturday, July 11, 2026 8:05:18 PM
To: CENAN-FiDiFORGE-203-Study <CEN[Exit full screen]tudy@usace.army.mil>
Subject: [Non-DoD Source] Stop the project !

No walls around manhattan

From: Jennifer Jager <graygardens11@gmail.com>
Sent on: Saturday, July 11, 2026 12:48:50 PM
To: CENAN-FiDiFORGE-203-Study <CEN[Exit full screen]tudy@usace.army.mil>
Subject: [Non-DoD Source] FIDIFORGE Public Comment

When doing this study and crafting a plan to protect this part of lower Manhattan it is critical that the following criteria be adhered to:
1. Preservation of the historic South Street Seaport. Careful attention to the character of the district and condition of the historic structures.
2. Keeping open access to the harbor with NO permanent high walls that will obstruct harbor views, access or utility.
3. Inclusion of as much natural and green space as possible for a neighborhood that is lacking this.
Jennifer Jager
274 Water St
10038
Sent from my iPhone

From: Sam Mak <samliz5c@yahoo.com>
Sent on: Sunday, July 12, 2026 10:36:42 AM
To: CENAN-FiDiFORGE-203-Study <CENAN-FiDiFORGE-203-Study@usace.army.mil>
Subject: [Non-DoD Source] New Buildings Height Control

Exit full screen

Just 1 comment - tooooo many highrisers. Well, if new buildings are authorized, at least their height should be more regulated, and pay more attention to allow for more spaciousness for the humans.

Sam Mak

Outlook

[Non-DoD Source] FiDi waterfront

From Lorenzini, Michael (Records) <MLorenzini@records.nyc.gov>
Date Mon 7/13/2026 9:51 AM
To CENAN-FiDiFORGE-203-Study <CENAN-FiDiFORGE-203-Study@usace.army.mil>

To Cheryl Alkemeyer,

It came across my desk you are collecting public comments on the FiDi waterfront. I don't have any particular comment, other than to point out some of the records at the NYC Municipal Archives and Library might be useful to your impact study. I used a number of them in this blog about the development of the area. https://www.archives.nyc/blog/2026/3/20/at-the-rivers-edge-maiden-lane-and-the-development-of-lower-manhattan

-Michael Lorenzini

Michael Lorenzini
Operations Manager
NYC Department of Records & Information Services (DORIS)
31 Chambers Street, New York NY 10007
O: 212-788-8576 C: 917-539-4660

Outlook

[Non-DoD Source] Public comment on the FiDi-Seaport Climate Resilience Plan

From Mandy Naglich <mknaglich@gmail.com>
Date Tue 7/14/2026 8:57 AM
To CENAN-FiDiFORGE-203-Study <CENAN-FiDiFORGE-203-Study@usace.army.mil>

After living in Fidi for more than a decade I can ensure you that access to the waterfront is central to the general wellbeing of the community. We have deperatly felt the loss of the waterfront in Battery park the last several years and have watched our beloved, relaxing park turn into a tourist traffic zone.

Maintaining clear access to the waterfront as well as the historic feel of the seaport is essential to the character of our neighborhood. While I certainly appreciate the need to protect infrastructure from future storms and floods, this needs to be balanced with the community's need for access to nature and historic character.

I hope to continue to give input as plans for the future of this project are released as this community is very engaged.

--
Cheers,

Mandy Naglich
My book How to Taste is a finalist for a Spirited Award! Order your copy here. 📚
215.906.8901 | drinkswithmandy@gmail.com
@drinkswithmandy | mandykn.com

Outlook

[Non-DoD Source] Comments on FiDi FORGE Section 203 EIS

From THOMAS SIMPSON <tsimpson4@msn.com>
Date Tue 7/14/2026 5:53 PM
To CENAN-FiDiFORGE-203-Study <CENAN-FiDiFORGE-203-Study@usace.army.mil>

1 attachment (943 KB)
Simpson Comments on FiDi Section 203 EIS Scope.pdf;

Please see attached my comments on the scope for the Section 203 Feasibility Study and EIS for the FiDi FORGE project.

Thank you,
Tom Simpson
Email: tsimpson4@msn.com

Public Comments on Section 203 Feasibility Study and EIS for the FiDi Seaport Resiliency Project

Submitted: July 14, 2026

These comments are submitted by Thomas Simpson, a longtime resident of FiDi at 21 West St, New York, NY 10006 since 2004, shortly after 9/11. My views on the FiDi Seaport Resiliency Project are based on extensive experience as a daily user of the waterfront esplanades and parks from Brooklyn Bridge on the East River to the Battery to Rockefeller Park on the Hudson River.

Summary of Main Points

With the FiDi Seaport Resiliency Project, we have an opportunity to address congestion along the East River esplanade and meet a core goal established for the project to "promote and enhance public access to the Financial District and South Street Seaport waterfront through quality open space." This is a once-in-a-generation opportunity to achieve the City's vision for the FiDi East River waterfront for the benefit of New York City residents and the many visitors who come to Lower Manhattan.

As further discussed in the comments below, the study team for the Section 203 Feasibility Study and EIS should develop a criteria-driven scoring system that fairly evaluates enhancement of public access to the East River waterfront as a paramount consideration for choosing between the three alternatives that have been put forth. Of the three, only Alternative 4, the medium extension into the water, scores highly on this criterion and should be judged accordingly.

Alternative 3, an exposed floodwall 15-18 feet tall along the existing bulkhead, fails to adequately address existing bottlenecks for pedestrian and bicycle traffic and, most concerningly, it disconnects the city from the water's edge, cuts off the public open space that exists between the Ferry Terminal and the Brooklyn Bridge from the views out across the East River and New York Harbor, and fails to adequately mitigate these negative impacts. For these reasons, Alternative 3 should be eliminated in the initial screening phase of project selection. Alternative 4A, the narrow extension into the water, should get a low score for waterfront access and connectivity.

Assessment of the Study Area

The current esplanade along the East River between the Battery Maritime Building and Pier 17 was rehabilitated by NYCEDC during the Bloomberg administration, at a time when FiDi was still recovering from 9/11. The goal was to transform the waterfront into a landscaped

waterfront park for passive recreational activities.[1] The first phase of the project, completed in 2011, delivered a pedestrian-friendly public open space from Wall Street to Maiden Lane with sweeping views across the East River and New York Harbor.

Sadly, the portion of the esplanade from the Battery Maritime Building to Wall Street/Pier 11 was reconstructed around the same time as a narrow walkway on the water side and a two-way bike lane between the walkway and the FDR. This stretch of esplanade is wholly inadequate to meet the current volume of traffic and at the same time accommodate other uses, such as resting and sightseeing. The picture below illustrates the overcrowded conditions on a summer day. In the foreground, barely visible behind the people, sits a row of benches which are unusable when traffic takes up the entire width of the walkway. The frequent overcrowding dramatically impacts use of that part of the waterfront esplanade for any purpose other than transiting through. This overcrowded city sidewalk is the antithesis of a pedestrian-friendly public open space.



[1] See: https://www.nyc.gov/content/planning/pages/our-work/plans/manhattan/east-river-waterfront#concept

As-is, the esplanade from the Battery Maritime Building to Wall Street/Pier 11 fails to achieve the City's vision for a landscaped waterfront park – there are no park-like amenities to speak of – and moreover fails to achieve its core function of providing adequate capacity for pedestrian and bike traffic, since the walkway is too narrow for the high volume of tourists, locals and commuters who use it, generating competition for limited space leading to frequent conflicts between strollers, dog walkers, joggers, bicyclists, baby carriages and slow-moving sightseers and picture takers.

Congestion is at its worst on the sidewalk along the Battery Maritime Building, which is heavily used by ferry goers, pedestrians and bicyclists, resulting in frequent accidents and harsh exchanges. In my experience, that sidewalk is the most dangerous pedestrian passage in Fidi. Lamentably, the Battery Maritime Building, Staten Island Ferry Terminal and the Coast Guard Recruiting building together form a wall blocking off a truly spectacular view of the New York Harbor from public access on land. The City invested tens of millions of dollars in rehabilitating the Battery Maritime Building during the Bloomberg administration but has so far failed to follow through on its commitment to provide public access and instead has leased it for the private use of well-heeled members of the Cipriani private club.

In recent years, the demand for access to the East River waterfront has exploded. Tourism is up, with South Street Seaport, Pier 17, Pier 11 and the Staten Island ferry terminal all attracting huge crowds of tourists. Besides the throngs of tourists, local residents – many of whom now work from home – head over to the waterfront at all times of the day, and people who commute into FiDi add to the demand for waterfront amenities and open space during lunchtime and after work.

Residential conversion of FiDi skyscrapers – spurred by post-pandemic incentives, including tax abatements and zoning changes meant to lower barriers for developers – is adding significantly to the local demand for waterfront access. The recently completed conversion project at 25 Water Street, one block from the East River downtown heliport, is the largest residential conversion in U.S. history adding over 1,300 new FiDi apartments. Other huge residential conversions recently completed or in progress within a few blocks of the FiDi resiliency project include160 Water Street (588 apartments), 55 Broad Street (571 apartments), 80 Pine Street (713 units), and 77 Water Street (647 units).

As a result of all this growth in demand for waterfront access, the open space and pedestrian and bike corridors created during the Bloomberg administration have reached and at times exceed their design capacities. The new waterfront design to be developed for the FiDi Seaport Resiliency Project must not only mitigate the impact of the proposed flood control structures on existing uses, but also expand access to meet the growth in demand.

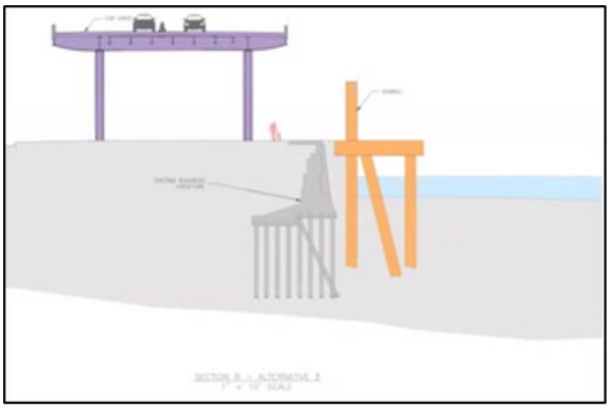
The new vision for the waterfront, as described in the City's report on Moving FiDi-Seaport Forward,[2] would enhance the public waterfront experience by creating public open spaces and community serving uses that are universally accessible. The esplanade along the Wagner Park waterfront (see picture below) provides a good example for the FiDi-Seaport esplanade to emulate. It features a wide walkway that accommodates unobstructed foot traffic together with harbor viewing from shaded benches and from the railing along the water. There is more open space on the inland side between the floodwall at the property line of the building and the esplanade, with a second pedestrian pathway through a landscaped corridor. This design, if adopted for the FiDi waterfront, would meet the resiliency project's objective for enhancement of public access to the waterfront.



[2] https://edc.nyc/sites/default/files/2025-12/NYCEDC-Moving-FiDi-Seaport-Forward-Report_12-12-2025.pdf

Assessment of Alternatives

The FiDi FORGE Feasibility Study and EIS will select between three design alternatives for the resiliency project, as shown in Figure 1.



Alternative 3



Alternative 4A

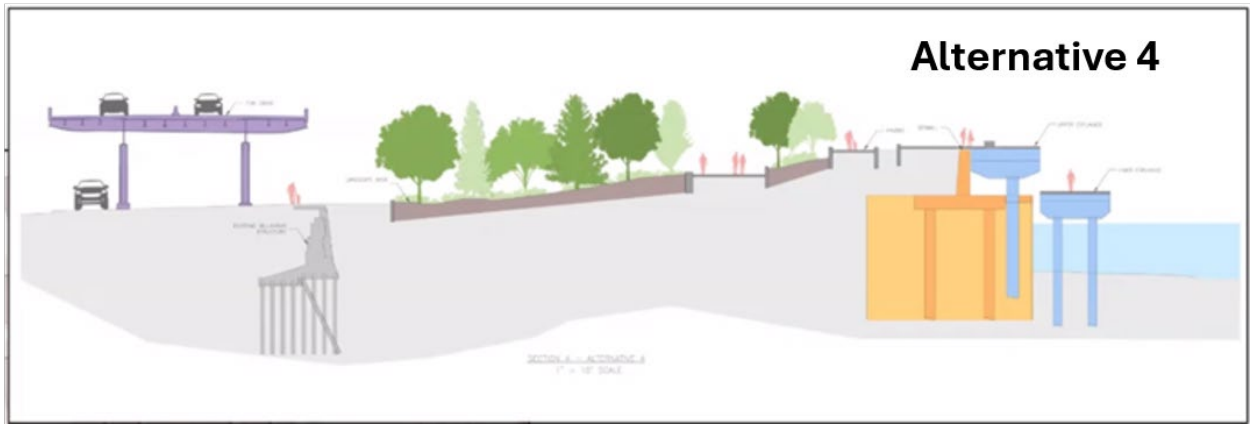


Figure 1: Alternatives for Evaluation in the Feasibility Study and EIS for the FiDi Seaport Resiliency Project

Alternative 3 (see Figure 2 below) is an exposed floodwall 15-18 feet tall along the existing bulkhead. This design fails to adequately address the aforementioned traffic congestion

and worse, it disconnects the city from the water's edge and cuts off what public open space exists between the Ferry Terminal and the Brooklyn Bridge from the views out across the East River and New York Harbor. Simply building a wall at the existing bulkhead with no provision for open space and expanded esplanades on the river view side, would do nothing to mitigate what would be lost.

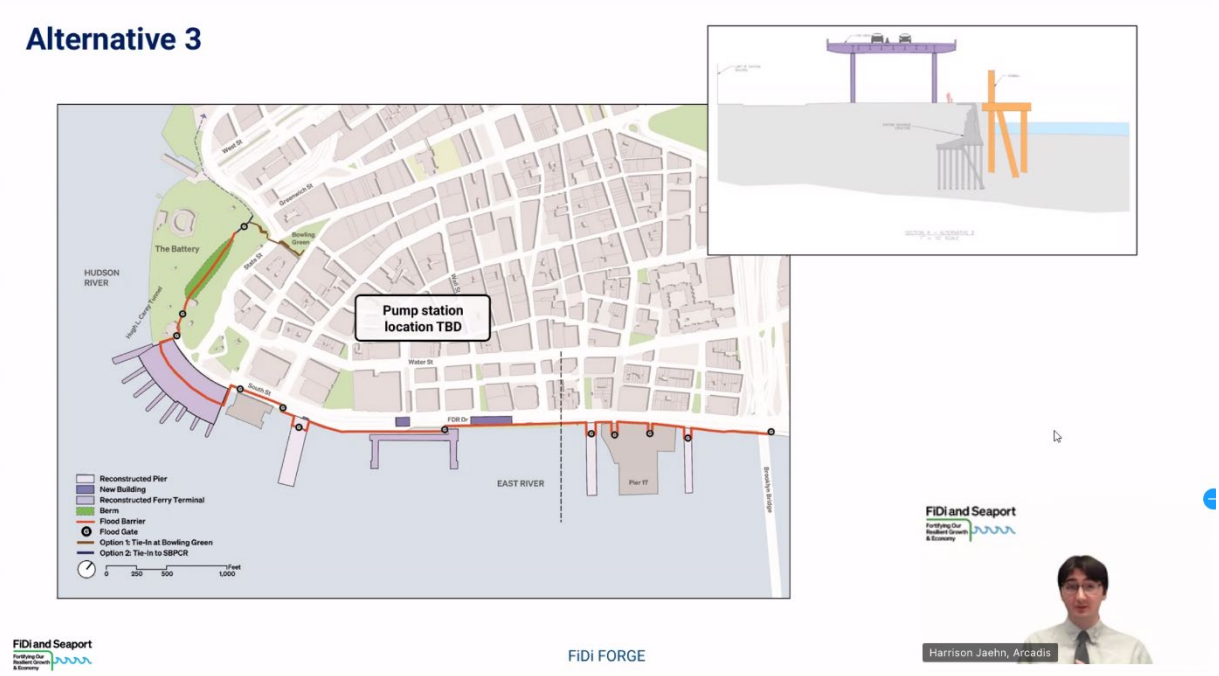


Figure 2: Alternative 3 Plan and Cross Section

Alternative 3 fails the stated goal of maintaining and increasing access to the waterfront, in particular its finest attribute: the views! Because Alternative 3 would reduce the amount of open space with access to harbor views compared to the existing configuration, it would force visitors onto piers for sightseeing and relaxation, which would overload the piers unless the plan were to construct several new ones. The existing Piers 15, 16 and 17 are already at design capacity serving the bars, tourist boats, sightseers and strollers. Pier 11 operates at or above its design capacity due to the popularity of NYC Ferry. Besides restricting access to the waterfront, Alternative 3 would do nothing to address the unsafe conditions on the sidewalk along the Battery Maritime Building; instead, it would make things worse by narrowing the space available for pedestrian and bicycle traffic to transit efficiently. For all of these reasons, Alternative 3 should be eliminated in the screening phase of the feasibility study.

Alternative 4A, like Alternative 3, cuts off the existing public open space on the city side of the standing wall from the view out over the river and harbor. This impact is partially

mitigated by introducing a waterfront esplanade built on a narrow shoreline extension. However, the narrow width of the extension and the inaccessibility of planted areas between the walkway and the floodwall fails to achieve the City's vision for a landscaped waterfront park suitable for passive recreational activities and community serving uses. For this reason, Alternative 4A should receive a low score for enhancing public access.

Alternative 4 accommodates the transit needs of pedestrians and bicyclists and promotes enhanced public access to the Financial District and South Street Seaport waterfront through quality open space. This alternative fully satisfies the resiliency project's goals for public access and should be awarded top score for this evaluation criteria. In addition, it addresses the dangerous conditions on the sidewalk along the Battery Maritime Building by routing foot traffic around the rear of the building, and provides public access to the scenic view of the harbor available at the rear of the building.

Recommendations for Feasibility Screening of Alternatives

Selection of the preferred alternative will depend on the scoring system used in the feasibility study. The study team should consider the following concepts in developing the scoring matrix:

- **Initial Screening (pass/fail)** – "Must have" goals of the project, like ability to withstand flooding, non-mitigable interference with water and land transport, provision of adequate access to views of the waterfront from positions along the bulkhead etc., should be scored pass/fail. An alternative that fails a "must have" goal should be eliminated in initial screening. For example, as discussed above, Alternative 3 fails to meet the minimum criteria for adequate public access and open space and should be eliminated in the initial screening.

- **Scoring** – An alternative that passes the initial pass/fail screening should be subjected to scoring, with each scoring criteria weighted according to relative importance. The quality of public access to open space with views of the river and harbor, which varies significantly between the three alternatives, should be weighted heavily as the overriding criteria for scoring. Any quantitative evaluation used for scoring should consider value added, such as enhancement of the tourism economy and recreational value to city residents, in addition to cost to construct. Alternative 3 may be relatively low cost to construct, but that does not account for the lost opportunity for high quality waterfront use by the public.

Other Comments

All three alternatives selected for the feasibility study are designed around a fixed upright wall up to 18' high. However, the final project selection should also consider, where it

would be feasible, the advantages of using deployable flip-up gates, like the resiliency project to the north along the East River from the Brooklyn Bridge to Montgomery Street. A stretch of flip-up gates may offer better connectivity to the waterfront compared to Alternatives 3 and 4A.

The underutilized parking strip under the FDR across from the FDNY firehouse on South Street between Old Slip and Gouveneur Lane, which is owned by the City and managed by NYCEDC, should be incorporated into the resiliency project and repurposed as public open space. As shown in the picture below, the fenced off parking lot is not only an eyesore and view blocker, it narrows the transit corridor and creates safety concerns for bicycle-pedestrian interactions. There are other vehicle parking options in lower Manhattan that could serve the City's needs without blighting the waterfront!



Outlook

[Non-DoD Source] FiDi FORGE REBNY Comments

From Maddie DeCerbo <mdecerbo@rebny.com>
Date Wed 7/15/2026 1:52 PM
To CENAN-FiDiFORGE-203-Study <CENAN-FiDiFORGE-203-Study@usace.army.mil>

1 attachment (750 KB)
20260723 FiDiFORGE EIS REBNY Comments.pdf;

Good afternoon,

Please see REBNY's comments on the FiDi FORGE EIS attached.

Thank you,

Maddie DeCerbo
Director of Urban Planning
Public Policy

The Real Estate Board of New York
570 Lexington Ave., New York, NY 10022
p: (212) 616-5238 | e: mdecerbo@rebny.com | www.rebny.com

Visit: REBNY.com

Instagram: instagram.com/rebny
LinkedIn: linkedin.com/company/rebny-real-estate-board-of-new-york-/
Twitter: x.com/REBNY

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REBNY Comments | July 2026

The Real Estate Board of New York on the

Fortifying our Resilient Growth and Economy (FiDi FORGE) Environmental Impact Statement

The Real Estate Board of New York (REBNY) is the City's leading real estate trade association representing commercial, residential, and institutional property owners, builders, managers, investors, brokers, salespeople, and other organizations and individuals active in New York City real estate. REBNY appreciates the opportunity to comment on the Environmental Impact Statement (EIS) for the Fortifying Our Resilient Growth and Economy (FiDi FORGE) project. REBNY strongly supports advancing this critical resiliency initiative and urges the City, State, and federal partners to continue moving the project forward expeditiously.

Lower Manhattan is one of the nation's most important economic and commercial districts. In 2024, the neighborhood generated an estimated $134.4 billion in economic output, accounting for 9.8% of New York City's GDP and 6.53% of New York State's GDP. In Fiscal Year 2025, Lower Manhattan generated $4.9 billion in tax revenue, representing approximately 6% of all City tax revenue. The district is home to approximately 233,000 private-sector employees, 70,000 residents, welcomes 17.7 million visitors annually, and serves approximately 417,000 daily subway, PATH, and ferry riders. Beyond its economic significance, the South Street Seaport is one of the nation's most historic waterfront districts, whose maritime heritage helped establish New York as America's leading port and financial center.

There is a clear need for infrastructure investment to reduce the long-term economic costs to the government as modelled by the no-action scenario. Hurricane Sandy caused an estimated $19 billion in citywide damages and lost economic activity, demonstrating the significant consequences of more frequent severe storm events and coastal flooding for residents, businesses, and critical infrastructure. Sea levels in New York Harbor have already risen approximately one foot since 1900 and are projected to rise by as much as five feet by the end of the century. Without additional flood protection, repetitive flooding is projected to result in as much as $20.3 billion in cumulative losses to the project area by 2100. These estimates do not fully capture the broader impacts associated with disruptions to the region's transportation, electrical, and stormwater infrastructure, which would have cascading effects throughout the city, state and national economy.

The FiDi FORGE project represents a critical investment in protecting Lower Manhattan's residents, businesses, and infrastructure from increasingly frequent and severe coastal flooding. In addition

to reducing future economic losses, the project will help preserve and strengthen property values, provide greater certainty for continued investment, and reinforce Lower Manhattan's role as a global business district within the United States. A resilient waterfront is essential to maintaining the area's long-term economic competitiveness and encouraging continued public and private investment.

REBNY also recognizes that this project will complement other resiliency investments throughout Lower Manhattan and help close remaining gaps in the city's coastal flood protection network. Given the scale of infrastructure work necessary to protect this nationally historically and economically significant geography for the nation’s future prosperity, it is imperative that planning, environmental review, funding, and implementation continue without unnecessary delay.

Thank you for the opportunity to comment.

CONTACTS:

Maddie DeCerbo

Director of Urban Planning

Real Estate Board of New York

Mdecerbo@rebny.com

Basha Gerhards

Executive Vice President of Public Policy

Real Estate Board of New York

Bgerhards@rebny.com

Outlook

[Non-DoD Source] FiDi FORGE Virtual Public Scoping Meeting 7/16 - FDNA Written Comments submitted

From Catherine Hughes <cmh176@gmail.com>
Date Thu 7/16/2026 4:20 PM
To CENAN-FiDiFORGE-203-Study <CENAN-FiDiFORGE-203-Study@usace.army.mil>
Cc Alexis Taylor <ataylor@edc.nyc>

1 attachment (26 KB)
DEISFiDiSeaport.docx;

Thank you for the opportunity to submit oral comments today.
Please find the complete comments attached.
If you have any questions, please let me know.
Again, thank you, and we look forward to working together,
Catherine McVay Hughes
Financial District Neighborhood Association (FDNA), Director
917.533.1234

Draft Integrated Interim Feasibility Report and Environmental Impact Statement for Financial District and Seaport Fortifying Our Resilient Growth and Economy (FiDi FORGE)
Coastal Storm Risk Management Section 203 Study
Comments submitted on July 16, 2026 by
Financial District Neighborhood Association

The Financial District Neighborhood Association (FDNA) supports the U.S. Army Corps of Engineers (USACE) and the New York City Economic Development Corporation (NYCEDC) working together to bring the Financial District and Seaport Fortifying Our Resilient Growth and Economy (FiDi FORGE) into compliance with the National Environmental Policy Act (NEPA) and an associated Environmental Impact Statement (EIS). This partnership could unlock federal funding to cover up to 65 percent of eligible construction costs for flood control elements that meet their criteria. NYC would be responsible for the remaining construction cost[1].

FDNA strongly supports the **FiDi FORGE Approach 4 (In Water with Medium Extension)**[2] because it most resembles the locally preferred choice which integrates the resiliency infrastructure along the waterfront: Moving FiDi-Seaport Forward Closing the Coastal Protection Gap (November 2025) where design advanced the FiDi-Seaport Climate Resilience 2021 Master Plan, a blueprint for comprehensive coastal storm risk management and infrastructure, which evolved through many years of public participation.

Under the EIS Analysis, consider the following:

- Maximize publicly accessible passive and active green open space along waterfront esplanade which is critical as FiDi's residential population surges with increased commercial building conversions and new buildings[3] with little green space[4] or trees[5] or parks[6]
    - Remove the FDR ramp south of Brooklyn Bridge since it disrupts access to the East River. This would address "Study Objectives to Address Needs" #4 "Maintain and increase vehicular and pedestrian access to and from waterfront destinations and historic/tourist amenities in study area"
    - Minimize footprint of bus parking loop and loading/unloading area at Staten Island Ferry Terminal, e.g. incorporate as much of Peter Minuit Plaza into The Battery as possible
    - Create a separate protected bicycle lane along roadway so that there are larger pockets of useable open space that can become a playground[7], ballfield or garden
- Address the Leaning Tower of Lower Manhattan at 161 Maiden Lane, a "670-foot condo tower that has been known to be leaning since 2019 and has simply been left standing at the Seaport." This uncompleted skyscraper is located on South Street next to the FDR and East River and needs to be resolved before construction begins.
- Minimize land side impact during demolition and construction as done with the NYC EDC's resiliency work at The Battery. This should include use of state-of-the-art best practices to minimize vibration[8], air pollution, noise pollution, e.g. use electrical construction equipment and barges (vs. concrete trucks on FiDi's historic streets)
- Consider maintenance above and below ground and operation of final project when designing, e.g. who will maintain park space
- Clarify how the FiDi area will be protected until FiDi FORGE is completed. The Interim Flood Protection Measure (IFPM) extends from Wall Street to the Brooklyn Bridge was implemented in 2019. Therefore, infrastructure and each building depend on their own hardening efforts and remain exposed to increasing extreme weather events and flood risk
- Continue to incorporate the NYC Blue Highways Program to move people and goods, reduce congestion and strengthen supply-chain resilience
- Incorporate well-maintained bathrooms at ferry terminal and city buildings

As we approach the 14-year anniversary of Superstorm Sandy that devastated our neighborhood, FiDi is the last piece of the Lower Manhattan Coastal Resiliency (LMCR) Project to be fully designed, funded and constructed. There is no other coastal storm risk management plan to protect FiDi[9]. FDNA supports FiDi FORGE Approach 4 (In Water with Medium Extension) that would add acres of public space that do not exist on the east side of Lower Manhattan while providing a coastal defense to protect where NYC began 400 years ago. Today FiDi continues to be a commercial, historical, and cultural center with 60,000 residents.

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[1] NYC has already funded EDC to continue design on the 0.9 miles of the FiDi-Seaport (aka FiDi FORGE) for FY 2026 and FY 2027 – i.e., through the completion of the feasibility study and draft EIS due spring of 2027. This budget pays for EDC staff, consultant design/EIS team and USACE staff support for this phase. EDC would need a new City funding allocation in next year's budget to continue design work in FY 2028 and beyond.

[2] Alternative 4 "is built into the water. The floodwall is integrated with a park, and the gate openings are raised to protect against future sea level change." Approach 4 (In Water) which "ranked the highest on average of all evaluated approaches, scoring high in effectiveness and completeness and medium in efficiency and acceptability" – and specifically Alternative 4

(Medium Extension) which “involves a medium-scale extension of the shoreline into the East River in a portion of the study area, elevating the waterfront by approximately 15-18 feet. This alternative buries the proposed floodwall under publicly accessible green open space.”

[3] Downtown Alliance Development Map: https://downtownny.com/business/development-map/

[4] Green Map NYC, https://greenmap.org/explore/maps/5ca89e37ef1f7e010007f54e

[5] New York City Tree Map: https://tree-map.nycgovparks.org/tree-map/neighborhood/84

[6] NYC Parks: https://www.nycgovparks.org/parks/park-x056?utm_

[7] There are only two small public playgrounds between Brooklyn Bridge and The Battery.

[8] There are two landmarked areas in flood zone: 18th- and 19th-century buildings of the South Street Seaport Historic District and Fraunces Tavern Block Historic District.

[9] U.S. Army Corps of Engineers (USACE) New York-New Jersey Harbor and Tributaries coastal storm risk management feasibility (NYNJHAT) study, a regional storm surge protection system, still needs to proceed, but currently it’s not moving quickly enough.

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[5] New York City Tree Map: https://tree-map.nycgovparks.org/tree-map/neighborhood/84

[6] NYC Parks: https://www.nycgovparks.org/parks/park-x056?utm_

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Outlook

[Non-DoD Source] Public Comment

From Susan Olds <susan.olds221@gmail.com>
Date Thu 7/16/2026 4:09 PM
To CENAN-FiDiFORGE-203-Study <CENAN-FiDiFORGE-203-Study@usace.army.mil>

As a resident in Southbridge Towers I strongly urge the adoption of the option that expands the publicly accessible waterfront property over the East River. (I believe that's option 4b).

The Seaport/FIDI neighborhood completely lacks public parks and amenities. Although the current seaport waterfront includes limited public amenities, these are overrun by public, tourist, transportation and commercial activities.

These activities include bike lanes crossing many pedestrian pathways, fume-spewing public and tourist boats, noisy and pollution heavy helicopters, transient tourist foot traffic, and the encroachment of commercial activies such as restaurants, bars and entertainment facilities into physical public space as well as loud acoustical disturbances.(Note that many of these areas were developed and/or are maintained using our tax dollars.)

I strongly urge the inclusion of passive, nature based, tranquil enclaves set apart from the above activities. I also urge the set aside of space for children and youth activies and sports.

As I said at the outset, our growing numbers of neighbors and families lack these outdoor public resources that are available to most neighorhoods.

Thank you for your time,
Susan Olds

Outlook

[Non-DoD Source] Survey

From Veronica Ryan-silverberg <vrs11@aol.com>
Date Mon 7/20/2026 2:26 PM
To CENAN-FiDiFORGE-203-Study <CENAN-FiDiFORGE-203-Study@usace.army.mil>

....Protect for flooding and storms ....No private money on public land ....Community have a say in all new development. ....No large residential towers impeding access to water and light ...main goal is preservation of historic community, no party cruises, large concert, etc ...zone and develop into a passive, quiet opportunity to have access to water ...No helicopters to cruise up and down the East River.....and monitor helicopter absue of the downtown heliport ....Quality life first priority (besides flood protection) for the community creating a healthy environment and respite.

Outlook

FW: NYBC Public Comments on FiDiFORGE

From Weppler, Peter M CIV USARMY CENAN (USA) <Peter.M.Weppler@usace.army.mil>
on behalf of
CENAN-FiDiFORGE-203-Study <CENAN-FiDiFORGE-203-Study@usace.army.mil>

Date Wed 7/22/2026 9:31 AM

To fidiforge@edc.nyc <fidiforge@edc.nyc>; Peterson, Casey <casey.peterson@arcadis.com>; Alexis Taylor <ataylor@edc.nyc>

1 attachment (118 KB)
FiDi FORGE 7.21.26.pdf;

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From: Carlo Casa <ccasa@buildingcongress.com>
Sent: Tuesday, July 21, 2026 2:24 PM
To: CENAN-FiDiFORGE-203-Study <CENAN-FiDiFORGE-203-Study@usace.army.mil>
Subject: [Non-DoD Source] NYBC Public Comments on FiDiFORGE

Good afternoon,

Attached please find our comments Support of FiDi FORGE, Alternative 4.

Thank you,

Carlo

Carlo Casa
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ELISE WAGNER ESQ.

** YOUNG PROFESSIONAL LIAISON*

7/21/2026

NEW YORK BUILDING CONGRESS

Ms. Cheryl Alkemeyer
FiDi FORGE NEPA Point of Contact
U.S. Army Corps of Engineers, New York District

Re: Support for FiDi FORGE, Alternative 4

Dear Ms. Alkemeyera and the FiDi FORGE Project Team:

On behalf of the New York Building Congress, I write in support of Alternative 4, the Medium Shoreline Extension, for the FiDi FORGE project. The Building Congress represents more than 500 organizations and more than 250,000 skilled tradespeople and professionals who plan, design, build, and maintain New York's built environment.

The Medium Shoreline Extension is the most appropriate option for Lower Manhattan's dense urban environment and the existing narrow public promenade behind the bulkhead. Alternative 4 also most closely aligns with NYCEDC's FiDi and Seaport Climate Resilience Plan.

The FiDi-Seaport Plan establishes a comprehensive approach to the remaining 0.9-mile stretch of shoreline within the Lower Manhattan Coastal Resiliency system. It balances continuous coastal flood protection with waterfront access and the critical transportation functions that keep Lower Manhattan moving. Alternative 4 provides the strongest basis to accomplish these goals while creating a better public waterfront.

As its design advances, Alternative 4 should carry forward the full goals and strategies of the FiDi-Seaport Plan. Feasible nature-based elements should supplement its structural protection system. NYCEDC and its consultants have also prepared detailed analyses of existing conditions, design strategies and potential mitigation measures that should inform the FiDi FORGE Feasibility Study and Environmental Impact Statement. We recognize the challenge NYCEDC faces in carrying this vision through a federal process governed by strict feasibility and cost criteria. That process is essential to securing federal funding, but pressure to reduce construction costs should not come at the expense of the broader resilience and public-realm goals established in the FiDi-Seaport Plan.

Lower Manhattan is a national economic center, and a project of this scale requires a strong federal partnership. The Section 203 process could unlock federal funding for up to 65 percent of eligible design and construction costs. NYCEDC and USACE should pursue the maximum available federal share and position the project for congressional authorization and appropriations as soon as the feasibility and environmental reviews are complete.

We urge NYCEDC and USACE to advance FiDi FORGE and Alternative 4 as the preferred option.

Thank you for your consideration.

Sincerely,

Carlo A. Scissura, Esq.
President and CEO
New York Building Congress

Outlook

[Non-DoD Source] AIANY Comments on FiDi FORGE Draft Scope

From Bria Donohue <bdonohue@aiany.org>
Date Wed 7/22/2026 2:44 PM
To CENAN-FiDiFORGE-203-Study <CENAN-FiDiFORGE-203-Study@usace.army.mil>

1 attachment (471 KB)
AIANY Comments on FiDi FORGE Draft Scope (7.22.26).pdf;

Hello,

Please see attached comments from the American Institute of Architects New York Chapter (AIANY) on the Draft Scope for the FiDi FORGE project.

Best,
Bria

Bria Donohue
Director, Government Affairs

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AIA New York

July 22, 2026

Cheryl Alkemeyer, NEPA POC
U.S. Army Corps of Engineers, New York District
Jacob K. Javits Federal Building, Planning Division
26 Federal Plaza
New York, NY 10278

Re: AIANY Comments on the Financial District and Seaport Fortifying Our Resilient Growth and Economy (FiDi FORGE) Section 203 Interim Feasibility Study and Environmental Impact Statement

American Institute of Architects New York Chapter (AIANY) offers the following comments on the Draft Scope for the Financial District and Seaport Fortifying Our Resilient Growth and Economy (FiDi FORGE) Section 203 Interim Feasibility Study and Environmental Impact Statement. AIANY represents 5,000 architects and design professionals committed to positively impacting the physical and social qualities of our city.

AIANY supports New York City Economic Development Corporation's (EDC) FiDi-Seaport Plan (Plan), which provides a multi-faceted coastal flood protection strategy to close the final gap in the city's Lower Manhattan Coastal Resiliency system. The plan balances the seemingly conflicting goals of providing continuous coastal flood protection along the 0.9 mile segment of Lower Manhattan's shoreline while maximizing pedestrian access and public open space along the waterfront and facilitating unimpeded maritime uses and operations.

We are encouraged by the partnership between EDC and the U.S. Army Corps of Engineers (USACE) to advance design studies and environmental reviews to evaluate the feasibility and suitability of achieving the goals and objectives outlined for the project, unlocking the opportunity for significant federal cost-share funding. If recommended by the USACE, Congress could appropriate federal funding for up to 65% of construction costs for coastal storm risk management (CSRM) elements, which would be an essential funding stream for the project.

Recommendation 1: Clarify Fi-Di FORGE Study Objectives:
As part of EDC's FiDi-Seaport planning process, its consultants prepared detailed analyses of existing conditions and developed alternative design strategies. The FiDi FORGE Draft Scope builds on EDC's Fi-Di-Seaport Plan, however the Draft Scope objectives insufficiently address two key components of the Plan. We encourage USACE to incorporate all goals and strategies from EDC's Plan into the FiDi FORGE Feasibility Study and EIS.

- Language should be added to Objective 4 clearly stating that the selected alternative provide significant publicly-accessible open space along the FiDi-Seaport shoreline. EDC's Plan's adopted universal design standards meeting ADA requirements which provide full access to all public spaces for users of all abilities.
- A new Objective 7 should be added stating that nature-based solutions should be introduced where feasible to provide a multi-layered, coastal storm protection system supplementing the structural

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protection system. Similarly, nature-based ecological strategies should be employed to maintain and protect marine habitat along the shoreline.

Recommendation 2: Support for FiDi FORGE Alternative 4

AIANY supports FiDi FORGE Alternative 4 - Medium Shoreline Extension. This alternative most closely aligns with EDC's FiDi-Seaport Plan, meeting all of the Draft Scope Objectives as the most beneficial and effective alternative within the context of Lower Manhattan's dense urban environment. The other alternatives included in the Draft Scope – No Build Alternative, Alternative 3, and Alternaitve 4A – fail to meet one or more of the Draft Scope Objectives.

Recommendation 3: Advance all components of design to the same level of development.

The Feasibility Study needs to advance the design of all components of the project to the same level of development to confirm program criteria, feasibility of concept designs, construction timelines, and estimate costs. Currently, the structural flood protection system is at approximately 30% design completion per EDC; the landscaping design is closer to a schematic design level; and building architecture, building systems, maritime infrastructure, and inland flood management designs are at a basic concept level. In particular, designs for the following components are lagging:

- Designs for the southernmost subarea which ties into the adjacent Battery Coastal Resiliency (BCR) project, proposed relocation and replacement of the Staten Island Ferry Terminal building, new Governors Island Ferry Terminal building, new sheer concrete seawall protecting the historic Battery Maritime Building, partial one block capping and extension of the Battery Park Underpass portal, and reconfiguration of adjacent public plaza areas are at a conceptual diagram level with many unresolved issues. Pedestrian access, the Manhattan Waterfront Greenway (bikeway), and vehicular circulation for the many visitors to these facilities need detailed analysis and design development to successfully integrate the flood protection systems, building designs, and landscaping into a cohesive environment.
- Pier 6 (Lower Manhattan Heliport), Pier 11 (NYC Ferry Terminal), and Pier 16 (South Street Seaport Museum) are proposed to be reconfigured and rebuilt. A new unprogrammed Pier 19 located between Pier 17 and the Brooklyn Bridge is proposed. Pier 15 will be eliminated, and Pier 17 will remain as is without reconstruction. Detailed programs should be developed for the proposed maritime infrastructure improvements with flexibility for future growth, expansion, and adaptation.
- The proposed newly created open space consists of an expanded high and low East River Esplanade, sloped waterfront park, plazas at the main public access portals, and several service and public amenity buildings. For the most part, the structured over-water pedestrian esplanade is shown as a hard walking surface with little differentiation in treatment. The recently completed East Midtown Waterfront Greenway can serve as a model for more varied and sustainable user experiences by incorporating a dense planting strip along the walkway with an integrated rainfall drainage and infiltration system punctuated by tree groves for shade and seating. Similarly, the planted landscape areas of the waterfront park show little differentiation in form, program, and user experience. The service buildings should be integrated into the green landscaping to minimize their physical presence, and the public buildings should afford maximum access and views to landscaped areas and the waterfront.

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Recommendation 4: Assess critical elements missing from Draft Scope

We recommend that critical elements missing from the Draft Scope should be evaluated in the Feasibility Study:

- With its Blue Highways initiatives, NYC is actively pursuing implementation of a partial mode shift to maritime freight as a more sustainable alternative to the city's truck dependent networks. The FiDi-Seaport plan presents an opportunity to establish a next-generation, purpose-built freight dock and transloading facility that goes beyond current plans to adapt existing pier infrastructure. A local maritime freight hub designed for the future should be a key element of the plan.
- The Draft Scope shows the elimination of Pier 15, which currently provides a publicly accessible recreational facility; instead, we recommend reconstructing this remnant of historically significant East River waterfront infrastructure for continued recreational use.
- As part of the inland storm management system improvements, strategies to reduce the frequency and volume of Combined Sewer Overflow (CSO) discharges resulting from flooding within the FiDi-Seaport stormshed should be evaluated. Large detention tanks could be buried within the Plan's bermed landscape infill to temporarily hold combined sewer discharge for later controlled release into the South Street interceptor sewer. By increasing the effective capacity of the local combined sewer system during flood events, CSO discharges could be reduced.
- The feasibility study should include a Basis of Design Manual summarizing program requirements, area or square footage requirements where relevant, design criteria, and design reference standards to be followed for each component of the project. The program analysis should anticipate a 50-year life cycle for the components and incorporate flexibility for future growth and change.

Recommendation 5: Maintain maritime operations along coast during construction

Maritime transportation infrastructure along the FiDi-Seaport coast must remain operational during the 10-year construction period to avoid disruptions to critical services, with temporary structures, infrastructure relocations, and/or rerouting. Realistic phasing strategies need to be developed with schedule implications and costs associated with the temporary construction identified.

Recommendation 6: Update cost estimates and construction schedule and consider alternative project delivery methods

Early conceptual cost estimates released by EDC for the FiDi-Seaport Plan range from $5.5 billion in 2025 to $8-9 billion when construction is expected to start in 2029 or 2030. The estimates include allowances for escalation and design and construction contingencies over the 10-year construction period. The estimates and construction schedule should be confirmed and updated as part of the Feasibility Study, with costs associated with temporary construction phasing included in the estimates. EDC's conceptual cost estimates assume that new wetlands will need to be produced to compensate for every acre of infill or shading over the water created by the project. If the assumption is confirmed, these associated costs and schedule impacts should be identified. Additionally, as the project design progresses EDC and USACE should consider alternative procurement and delivery methods to reduce costs, maintain schedules, and assure project quality goals.

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Recommendation 7: Identify City funding sources and grants for continued planning and implementation of FiDi FORGE, and future operations and maintenance costs

While funding is in place in the FY26 and FY27 City budgets for EDC and other agency staff, EDC's design and environmental consultants, and USACE support staff for the Sec. 203 Feasibility Study and EIS, additional funding will be required from future City budgets to support final design and obtain necessary permits and approvals. Additionally, the City needs to begin planning for the local cost-share funding that it will be responsible for. Longer term, the City will need a funding source for future operations and maintenance of the completed project.

Recommendation 8: Clarify Feasibility Study information and graphics

To facilitate a full understanding of the extent and impacts of the Feasibility Study alternative designs, the Integrated Interim Report should include the following:

- Indicate current bulkhead line and proposed seawall locations, and summarize the areas of proposed shoreline extension infill and shading from existing and proposed over-water structures.
- Site plans should show contour changes in ground level elevations.
- Building plans and sections should include finished floor and roof elevations.
- Site and building sectors should show datum elevations indicating criteria for projected sea level rise, tidal flooding, storm surge, and storm wave action.

Building on the detailed, multi-year analysis, design, and community engagement behind EDC's FiDi-Seaport Plan, AIANY believes FiDi FORGE Alternative 4 will emerge as the preferred alternative. We urge EDC and USACE to work as partners to advance the design of Alternative 4 so that all components of the Plan are developed to the same level and fully integrated into a cohesive vision for the FiDi-Seaport waterfront. The highest standards for urban design, landscape design, infrastructure design, and building design consistent with other Lower Manhattan climate resiliency projects should be adopted for the FiDi-Seaport waterfront.

We appreciate your consideration of AIANY's comments and look forward to robust public outreach and engagement as this critical project progresses to the next stage.

Sincerely,



Jesse Lazar
Executive Director
American Institute of Architects New York Chapter

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Advocating For all New Yorkers

July 23, 2026

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Comments on the Draft Scope of Work for the FiDi FORGE Environmental Impact Statement and Integrated Interim Feasibility Report

The City Club of New York appreciates the opportunity to comment on the Draft Scope of Work for the Environmental Impact Statement (EIS) and Integrated Interim Feasibility Report for the Financial District and Seaport **Fortifying Our Resilient Growth and Economy (FiDi FORGE)** Coastal Storm Risk Management Project.

The City Club recognizes that sea level rise, coastal flooding, and increasingly frequent and intense storms present growing challenges throughout New York City. Addressing these risks will require thoughtful planning, sound science, significant public investment, and careful consideration of priorities across the City's waterfront.

As one of the largest and most consequential climate adaptation and public infrastructure projects proposed in New York City, FiDi FORGE has the potential to shape Lower Manhattan for generations and to influence future resilience planning throughout the region. Because of its scale, cost, and long-term implications, the Environmental Impact Statement should provide a comprehensive, transparent, and objective evaluation of the project's alternatives, environmental impacts, costs, benefits, and tradeoffs.

The Draft Scope of Work provides a thoughtful framework for environmental review and identifies many of the issues that warrant detailed analysis. Given the scale and long-term significance of FiDi FORGE, however, the Environmental Impact Statement should do more than identify environmental impacts and mitigation measures. It should clearly explain how alternatives were developed and evaluated, identify the assumptions, methodologies, and decision criteria used throughout the planning process, and provide sufficient information for decision-makers and the public to understand the tradeoffs among competing approaches.

The Financial District and Seaport Climate Resilience Master Plan (FDSCRMP) was developed through years of technical analysis, interagency coordination, and public engagement, and established three overarching goals: protecting Lower Manhattan from tidal flooding and coastal storms;

integrating climate resilience infrastructure into the city; and enhancing the public waterfront through new open space and community-serving uses. The Environmental Impact Statement should evaluate the extent to which the proposed alternatives advance—or depart from—these planning objectives and explain the reasons for those differences.

The City Club offers the following recommendations to strengthen the Final Scope of Work and help ensure that the subsequent Draft EIS provides a comprehensive, transparent, and technically rigorous evaluation of the proposed project and its alternatives.

1. Plan FiDi FORGE as Part of an Integrated Lower Manhattan Resilience System

The Draft Scope appropriately describes the evolution of climate resilience planning in Lower Manhattan, including the Lower Manhattan Climate Resiliency Study, the Financial District and Seaport Climate Resilience Master Plan, and adjacent resilience initiatives. However, the environmental review itself is largely confined to the FiDi FORGE project area. The Draft Scope also states that the Seaport Coastal Resilience Project will not be included because it has not yet been approved.

While this approach may simplify the environmental review, it risks overlooking how individual resilience investments function as parts of a larger system. Flood protection, transportation, ecological restoration, waterfront access, emergency response, and stormwater management do not stop at project boundaries. Decisions made within FiDi FORGE will influence the effectiveness of adjacent resilience projects, just as those projects will influence the long-term success of FiDi FORGE.

Accordingly, the City Club recommends that the Final Scope of Work expand its cumulative analysis to evaluate how FiDi FORGE integrates with surrounding resilience initiatives, including the Seaport Coastal Resilience Project, Battery Park City Resiliency, The Battery Coastal Resilience Project, the Brooklyn Bridge–Montgomery Coastal Resilience Project, and the broader New York and New Jersey Harbor and Tributaries Study (HATS). In particular, the scoping should address how the different alternatives would affect the cost/benefit analysis of each existing HATS alternative including but not limited to the Tentatively Selected Plan.

The EIS should explain whether FiDi FORGE is intended to function as an independent project, an initial phase of HATS implementation, or a complementary project whose design assumptions will influence future HATS recommendations. The scoping process should examine how the alternatives affect the HATS study and explain how FiDi FORGE has been coordinated with the HATS planning process.

The analysis should also explore opportunities to leverage existing infrastructure—including the FDR Drive corridor—to improve flood protection while minimizing environmental impacts and maximizing public benefit.

The Final Scope should require a continuous line-of-protection plan and a segment-by-segment design-basis table for FiDi FORGE and each adjoining project. For every segment and tie-in, the report should disclose the vertical datum, design event, planning year, sea-level-rise assumption, passive and structural protection elevations, freeboard, deployable elements, closure points, residual risk, and adaptation provision. The EIS should test mismatched design standards, incomplete or delayed adjoining projects, inland and sewer pathways, temporary construction conditions, gate or pump failure, power loss, and exceedance events; map every route by which water could enter behind completed protection; and identify the entity responsible at each interface. The report should also state how FiDi FORGE shares data, assumptions, dependencies, and residual-risk responsibilities with HATS without treating the two studies as the same project.

The EIS should also evaluate how the various Lower Manhattan coastal resilience projects function together as an integrated flood protection system. In particular, it should assess whether differences in design flood elevations (DFE), alignments, or project sequencing could allow floodwater to bypass higher levels of protection by entering protected areas from adjacent or inland segments. The EIS should explain how the individual projects are designed to work together to prevent flooding from behind completed flood protection systems and identify any measures needed to avoid unintended vulnerabilities at the interfaces between projects.

Providing a transparent explanation of these design standards will help the public understand how the individual projects function together as components of a coordinated Lower Manhattan coastal resilience system.

2. Develop Integrated Resilience Strategies

The Draft Scope proposes evaluating five thematic approaches and advances the Structural on Land and Structural in Water approaches for detailed study while screening out the standalone Engineering with Nature approach.

The City Club appreciates the rationale for comparing different approaches during plan formulation. However, the alternatives as currently framed do not fully reflect how successful climate resilience projects are designed and implemented.

Contemporary waterfront resilience relies on layered systems that integrate structural protection, nature-based features, interior drainage, green infrastructure, transportation improvements, and high-quality public space. These strategies are complementary rather than competing. Treating Engineering with Nature as a separate alternative, rather than integrating nature-based solutions into the structural alternatives, risks overlooking opportunities to improve ecological function, reduce environmental impacts, and enhance the public realm.

The Final Scope of Work should evaluate whether integrated resilience strategies combining structural and nature-based approaches could better achieve the project's stated objectives while reducing

environmental impacts, construction costs, implementation timelines, or other tradeoffs. In particular, the EIS should explain how Engineering with Nature measures will be incorporated into the structural alternatives; evaluate opportunities to reduce unnecessary encroachment into the East River while maintaining flood protection objectives; enhancing rainfall absorption, and storage, maximize publicly accessible waterfront and open space; and identify opportunities for habitat restoration, biodiversity, and ecological enhancement consistent with the goals of the FDSCRMP.

The planning horizon should extend beyond the currently proposed 50-year timeframe. Major public infrastructure investments made today should be expected to serve the city for a century or more. Accordingly, the EIS and project design should evaluate conditions at 100- and 150-year horizons to ensure that today's investments remain resilient, adaptable, and cost-effective under accelerating sea level rise and changing climate conditions.

For every measure and alternative, the Integrated Interim Report should publish the screening criteria, definitions, underlying data, ratings or scores, thresholds, weights, cost basis, uncertainty, and reason for advancement or elimination. It should identify the nonstructural, Engineering with Nature, drainage, transportation, and public-realm components included in each structural alternative and test whether reasonable changes in assumptions would change the final array or Tentatively Selected Plan. The report should distinguish the formal 50-year economic period from the longer service life of major structures, test performance at least through 2100 and over each component’s expected life, and identify the cost, feasibility, lead time, and trigger for future adaptation. Designs that foreclose later options or transfer risk should be identified explicitly.

3. Measure Project Performance, Not Simply Environmental Impacts

The Draft Scope appropriately emphasizes identifying environmental impacts and mitigation measures across a broad range of resource categories. While this analysis is fundamental to NEPA review, FiDi FORGE is intended to accomplish far more than avoiding adverse impacts.

The environmental review should also evaluate how effectively each alternative achieves the project's stated objectives and the broader goals established in the Financial District and Seaport Climate Resilience Master Plan. Including measurable performance criteria would provide a more transparent basis for comparing alternatives and understanding the tradeoffs among them.

The EIS should also clearly identify the design standards, climate assumptions, and sea level rise scenarios used to evaluate project performance and explain how the proposed system can be adapted over time as climate science and flood risks evolve.

4. Strengthen the Transportation Analysis

The Draft Scope identifies maintaining transportation connectivity as one of the project's principal objectives and includes transportation among the technical analyses proposed for the EIS.

The Final Scope should require an operating-performance analysis for ferries, subways, buses, roads, pedestrians, bicycles, freight, emergency vehicles, and maritime services. The analysis should disclose current and future service, passenger and freight volumes, berth and terminal capacity, accessible routes, transfer patterns, and network dependencies. Alternatives should be compared using a bounded set of measures: passenger throughput, berth availability, accessible transfer time, street and greenway continuity, service-interruption duration, emergency and evacuation capacity, and time to restore operation. Hydrodynamic and navigation analysis should quantify changes in currents, maneuvering conditions, and access to maritime facilities during construction and operation.

Included in the analysis should be studies of how proposed changes to the shoreline will impact the currents of the East River and how changes in currents will impact maritime navigation.

The analysis should include options to increase connectivity with the existing street grid to enhance pedestrian access and visual and physical continuity, taking into account the NYC landmarked Street Plan of New Amsterdam and Colonial New York.

5. Strengthen the Analysis of Stormwater Management, Interior Retention and Drainage, and Emergency Response

The Draft Scope appropriately includes Water Quality and Stormwater Management as a technical resource category. However, the proposed methodology focuses primarily on potential impacts to existing infrastructure rather than evaluating how each alternative improves stormwater management and interior drainage capacity.

The Final Scope should require a defined compound-flooding test matrix pairing rainfall, tide, coastal surge, sea-level rise, and groundwater conditions, with the timing relationship among those hazards stated explicitly. The EIS should state whether collection, sewer conveyance, storage, gates, pumping, outfalls, and operating controls are unified, coordinated but separate, or independent by project area. The Integrated Interim Report should disclose model boundaries, calibration and validation, rainfall distributions, wastewater inputs, boundary conditions, assumptions about adjacent projects and interceptor gates, and uncertainty. It should test blocked outfalls, gate nondeployment, power loss, pump outage, and conveyance failure and report flood depth, extent, duration, sewer surcharge, combined-sewer-overflow volume, and recovery time. Pump analysis should identify capacity, redundancy, backup power, discharge constraints, maintenance access, and operating responsibility.

Similarly, the Draft Scope references emergency access as one of the project's objectives but provides relatively little discussion of how the alternatives will support emergency response and evacuation. The EIS should evaluate how each alternative affects emergency vehicle access, maritime evacuation, ferry operations during emergencies, and the resilience of critical transportation infrastructure.

6. Establish a Framework for Long-Term Governance, Monitoring, Adaptive Management, and Financial Sustainability

The Final Scope should require an asset-responsibility matrix identifying the owner, operator, maintainer, emergency decision-maker, and funding source for each floodwall, gate, pump, conveyance element, outfall, ferry facility, public space, and project tie-in. The report should state activation thresholds, command and communications protocols, inspection and testing requirements, backup-power arrangements, replacement schedules, and the process for modifying interfaces as adjoining projects or climate conditions change. Lifecycle comparison should include capital cost, contingency, operations, energy, major renewal, adaptation, and the fiscal consequences of delayed or incomplete funding. Public monitoring should be limited to the performance measures used to justify the selected plan.

The EIS should evaluate each alternative using lifecycle financial analysis rather than initial construction cost alone. Capital costs, operating costs, maintenance obligations, long-term repair needs, anticipated funding sources, remaining funding gaps, and long-term financial responsibilities should all be compared as part of the alternatives analysis.

Given the scale of the proposed investment, the analysis should also identify the long-term fiscal implications for the City and discuss how funding commitments to this project may affect the City's ability to address resilience needs in other vulnerable neighborhoods.

Finally, the Final Scope should establish a long-term monitoring framework with publicly available performance measures for flood protection, ecological conditions, infrastructure performance (including CSO discharges, public access, and public use) so that project effectiveness can be evaluated over time and management strategies refined as conditions change.

7. Maximize Public Benefits

Throughout the Draft Scope, the methodologies emphasize identifying adverse impacts and mitigation measures. The City Club encourages the Final Scope to give equal attention to evaluating the public benefits each alternative is intended to deliver.

The EIS should assess how each alternative expands publicly accessible waterfront, improves the quality and usability of public open space, strengthens ecological systems, restores habitat, supports community programming, preserves historic resources and their character-defining elements, preserves significant views, improves accessibility for people of all ages and abilities, and contributes to the long-term vitality of Lower Manhattan.

Finally, because construction is anticipated to extend over approximately a decade, the EIS should include a consolidated analysis of cumulative construction impacts on neighborhoods, businesses, schools, transportation systems, cultural institutions, public health, and waterfront access, together with clear mitigation measures that minimize disruption throughout the construction period.

The analysis should also evaluate construction sequencing and identify opportunities to phase work in ways that preserve neighborhood access, support local businesses, maintain maritime and emergency response capabilities, minimize disruption to existing public spaces and waterfront activities, and reduce cumulative impacts over the duration of construction.

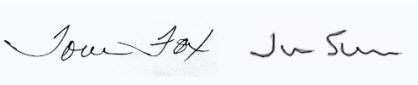
Conclusion

The City Club appreciates the significant effort that has gone into developing the Draft Scope of Work and recognizes the importance of carefully evaluating strategies to address increasing coastal flood risks in Lower Manhattan. Because FiDi FORGE represents one of the largest and most consequential public infrastructure investments proposed for New York City, the Environmental Impact Statement should provide a transparent, comprehensive, and objective evaluation of the project's alternatives, impacts, costs, benefits, and long-term implications.

A robust EIS will enable decision-makers and the public to better understand the tradeoffs among alternatives and help ensure that any future investment is well-founded, environmentally responsible, and in the public interest.

Sincerely,

City Club Waterfront Committee Co-Chairs



Tom Fox
Trustee

John Shapiro
Vice-President

.

REGION 2
NEW YORK, N.Y. 10007

July 23, 2026

Peter Weppler
Chief, Environmental Analysis Branch
U.S. Army Corps of Engineers, New York District

Subject: Financial District and Seaport Fortifying Our Resilient Growth & Economy (FiDi FORGE) Coastal Storm Risk Management Section 203 Study

Dear Mr. Weppler:

The U.S. Environmental Protection Agency (EPA) has received information presented in the Public Notice to prepare a Section 203 Study and Environmental Impact Statement (EIS) for the Financial District and Seaport Fortifying Our Resilient Growth & Economy (FiDi FORGE) Coastal Storm Risk Management Section 203 Study for New York, New York (the Project). EPA reviewed these documents related to resource areas within our jurisdiction in accordance with our responsibilities pursuant to the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

As a cooperating agency for the project, we are providing the enclosed scoping comments for consideration as USACE and NYCEDC prepare the EIS. We look forward to working with your team to meet the purpose and need of the Project while continuing efforts to protect human health and the environment. If you have any comments or questions, please reach out to schaffer.anne@epa.gov or 212-637-4347.

Sincerely,

MARK AUSTIN Digitally signed by MARK AUSTIN
Date: 2026.07.23 15:53:02 -04'00'

Mark Austin
Office of the Regional Administrator

EPA Scoping Comments
Financial District and Seaport Fortifying Our Resilient Growth & Economy (FiDi FORGE) Coastal Storm Risk Management Section 203 Study
July 23, 2026

General Comments

Statutory Authorities and Regulations: 42 U.S.C. § 7609; 42 U.S.C. § 4321 et seq.

1. EPA recommends the EIS provide clear criteria for the evaluation of alternatives. These criteria could consider how each alternative satisfies the project purpose and need in addition to consideration of feasibility and USACE's principles and guidelines. Additionally, EPA recommends the EIS clarify how the purpose and need differ from the goal and objectives of the study presented in the EIS Scoping Additional Information Document, including how the terms are used in the alternatives evaluation.
2. EPA suggests the environmental review document fully describe transportation modifications that will be considered as part of each build alternative.

Air Quality

Statutory Authorities and Regulations: 42 U.S.C § 7609; 42 U.S.C. § 4321 et seq.; 40 C.F.R. Part 51 and § 52.21; 40 C.F.R. §§ 93.107 and 93.109

3. EPA encourages NYCEDC to analyze the impacts on air quality during project construction (i.e. simultaneous operation of heavy machinery, combustion engines, and demolition). Given the proximity of the construction to sensitive receptors, including nearby schools and hospitals, and the extent of the construction timeframe, NYCEDC should evaluate strategies to measure and mitigate exposures during project implementation.

4. As New York City is in a nonattainment or maintenance area for several criteria pollutants, EPA supports the intention to analyze air quality impacts and suggests discussing the applicability of general conformity in the EIS.

Wetlands and Water Resources

Statutory Authorities and Regulations: 42 U.S.C § 7609; 33 U.S.C. § 1341; 33 U.S.C. § 1342; 33 U.S.C. § 1344; 42 U.S.C. § 4321 et seq.; 40 C.F.R. Part 230

5. As the alternatives being considered have varying footprints on land, EPA encourages NYCEDC to evaluate the degree to which each alternative will alter stormwater management in the area. This may include necessary stormwater infrastructure upgrades to mitigate effects of high flow events or storm surge.

6. EPA recommends a robust alternatives analysis be developed which shows that impacts to waters of the United States, including wetlands, streams, and other aquatic resources, be avoided and minimized to the maximum extent practicable.

Outlook

[Non-DoD Source] East Side Resiliency - glaring public problem remains unaddressed

From Meriam Lobel <meriam.lobel@gmail.com>
Date Thu 7/23/2026 11:44 AM
To CENAN-FiDiFORGE-203-Study <CENAN-FiDiFORGE-203-Study@usace.army.mil>

Dear Army Corps of Engineers,
As a resident of the Seaport for 49 years, I have great fondness for this neighborhood that not only provides a window into NYC history but also provides a vista to the beautiful riverfront and harbor that have been key to the City's growth.
Since 2019, I have been concerned about an unresolved and disputed building erected at 161 Maiden Lane which engineers have reported is leaning 3 inches to the north. I live at 85 South Street, 2 lots away from the leaning tower.
I understand this is a complicated situation because several parties involved are arguing who is at fault. Meanwhile the public is at risk. What will happen if there is an earthquake larger than the one that occurred on April 5, 2024? What will happen when there is construction along the riverfront opposite 161 Maiden Lane? Is there any reason to leave a building standing even after numerous engineers have said that it cannot be completed due to its faulty foundation?
I hope that with your expertise you will be able to assess the situation and urge the responsible parties to address the problem before it becomes a crisis.

Sincerely,
Meriam Lobel
85 South Street
New York, NY 10038

Outlook

[Non-DoD Source] Comments on NYCEDC's Draft Integrated Interim Response Feasibility Report and Environmental Assessment for the "FiDi FORGE" CSRM Section 203 Study

From Paul Gallay <pag57@columbia.edu>

Date Thu 7/23/2026 4:10 PM

To CENAN-FiDiFORGE-203-Study <CENAN-FiDiFORGE-203-Study@usace.army.mil>

Cc Alexis Taylor <ataylor@edc.nyc>; Weppler, Peter M CIV USARMY CENAN (USA) <Peter.M.Weppler@usace.army.mil>; Jackie Klopp <jk2002@columbia.edu>; Eunice Ko <eunice@nyc-eja.org>; Victoria Sanders <victoria@nyc-eja.org>

1 attachment (149 KB)

RCCP Comments on HATS 2026 FiDi FORGE Plan.pdf;

Dear NYCEDC and USACE Colleagues:

The Resilient Coastal Communities Project, based at Columbia University's Center for Sustainable Urban Development and in partnership with the New York City Environmental Justice Alliance, respectfully submits the attached comments on NYCEDC's Draft Integrated Interim Response Feasibility Report and Environmental Assessment for the "FiDi FORGE" CSRM Section 203 Study.

Thank you in advance for your consideration of these comments. Please let me know if we can provide further information in connection with them.

with appreciation,

Paul Gallay, for RCCP

Center for Sustainable Urban Development
Columbia Climate School
61 Claremont Avenue - Rm 520E, New York, New York 10115
914-574-7331
pag57@columbia.edu

"Action Is The Antidote To Despair."

Columbia University is located on the ancestral homelands of the Munsee Lenape and Wappinger peoples.

COLUMBIA CLIMATE SCHOOL
CENTER FOR SUSTAINABLE URBAN DEVELOPMENT

Comments on the New York City Economic Development Corporation's (NYCEDC's) Draft Integrated Interim Response Feasibility Report and Environmental Assessment for the "FiDi FORGE" Coastal Storm Risk Management Section 203 Study

On behalf of the [Resilient Coastal Communities Project (RCCP)[1] team, based at Columbia University's Center for Sustainable Urban Development and in partnership with the New York City Environmental Justice Alliance (NYC-EJA), we share the following comments and concerns about the Draft Integrated Interim Response Feasibility Report and Environmental Assessment for Actionable Elements for the "FiDi FORGE Coastal Storm Risk Management Section 203 Study. These comments fall into the following categories:

- The adequacy and fairness of this opportunity for public comment
- The fairness of the FiDi FORGE Plan in regard to waterfront protection and amenity creation and other environmental justice concerns
- The lack of reasonable consideration of Natural and Nature Based Features
- The adequacy of the environmental analysis to be performed as part of this feasibility report and impact assessment

With regard to the adequacy of this public comment opportunity from the standpoint of fairness and due process, the EIS scoping document lacks sufficient information to support full and fair public comment regarding the project's alternatives and the criteria, methodology, and assumptions used to analyze, compare, and identify the chosen alternatives, and those used to establish a proposed scope for the evaluation of the project's environmental impacts. The public is, thus, kept in the dark about what was learned and how that knowledge was used to choose/screen out alternatives, as well as the extent, nature, and sufficiency of the project sponsor's specific plans for evaluating environmental impacts.

Specifically the public has not been given any adequate understanding of the cost/cost-effectiveness differences between each alternative (and sub-alternatives), nor has it been given sufficient substantive information about any initial environmental analyses that may have been performed for each alternative (including more information about the extent of river filling for Alternatives 4 and 4A [e.g., volume of fill required for each alternative, degree of habitat loss, potential mitigation, etc.]), the scope of intended environmental impact analyses, a proper understanding of which maritime features are intended to be preserved and which maritime features would be lost in Alternative 5 and why such loss led to Alternative 5 being screened out. The information provided at this time is inadequate to develop thorough comments on the scope. The lack of information on environmental impacts is concerning. Meaningful public participation requires NYCEDC and USACE to provide enough information for the public to understand the alternatives, evaluate their consequences, and offer informed comments on the environmental review.

[1] The RCCP is a partnership between the Columbia Climate School and the New York City Environmental Justice Alliance seeking to foster new collaborations between environmental justice communities, practitioners, and researchers, as envisioned in Columbia's Task Force Report on Directed Action, to help develop actionable, fundable, and fair solutions to flood risks that also deliver complementary benefits, like habitat restoration, job creation, and greater community cohesion – and put into practice the Climate School's commitment to fairness, social justice, and anti-racism. The RCCP also unequivocally advocates for increased community voice in flood planning and response in New York City to deliver better and more just solutions.

With regard to the fairness and scope of the proposed FiDi FORGE project: while it is understandable that the City of New York is seeking to protect the areas of lower Manhattan covered by the FiDi Forge plan, this same sort of protection, or any specific plan for it, is lacking for hundreds of other communities throughout New York City. Further, the billions of dollars worth of proposed waterfront amenities associated with Alternative 4A and, especially, Alternative 4, in this area of the City which already benefits from numerous recreational and cultural amenities, is fundamentally inequitable in view of the relative absence of such amenities from waterfront areas in state- and federally-identified disadvantaged communities throughout the City such as East Harlem, Port Morris, Mott Haven and others.

While we are not proposing a "barebones" solution such as Alternative 3 for the FiDi FORGE project area, we do seek the inclusion, in the Environmental Assessment for this project, of a **new Alternative 4B**, which would include the sort of bermed barrier found in Alternative 4A but not the waterfront promenade associated with that alternative. Such an alternative would also reduce the environmental impact of the in-water fill, pile driving, and shading of alternatives 4 and 4A.

Funding should be provided for such amenities in the communities cited above and other waterfront amenity-deprived communities around New York City before additional public funds are devoted, as with Alternatives 4 and 4A, to augmenting the existing waterfront amenities in the FiDi FORGE project area. Alternatively, investment in additional waterfront amenities in the area of the FiDi FORGE project should be underwritten by the neighboring business community, as in the case of the "Little Island" project in the Hudson River Park.

To offer an example of how a FiDi Forge project based on Alternative 4 or 4A would continue the pattern of disproportionate coastal risk management investment in high-income communities, we note that the only structural features proposed, in the Army Corps of Engineers' 2025 "Actionable Item" plan for East Harlem, were floodwalls, rather than bermed barriers (let alone such barriers coupled with billions of dollars worth of waterfront amenities). Rather than continuing to "gild the lily" in the FiDi area of lower Manhattan, EDC and the Army Corps should be cultivating the untapped potential of areas like East Harlem, which is the only Manhattan community lacking connection to the recreational "greenway" at the periphery of the island, or Port Morris and Mott Haven, whose community-developed Waterfront Access Plan remains almost completely unfunded and unbuilt, nearly 15 years after that plan was first proposed.

Looking at the fairness and adequacy of the NYNJHATS project as a whole, we urge New York City and the US Army Corps of Engineers (USACE) to practice and advocate for community empowerment in their continuing work on the study. To date, we have been extremely disappointed by how disadvantaged communities have been underprioritized during this project. We have seen both the project leads and sponsors claim to ascribe to a community-centered approach, without actually implementing such an approach. In reality, USACE's overall plan for the NY-NJ region fails to protect many low-income waterfront communities in the impacted study area and USACE has neglected to properly engage and collaborate with these working class communities during this critical planning phase of NYNJHATS. A final NYNJHATS plan that centers the needs of low-income, disadvantaged communities, along with a robust and fair public engagement strategy that prioritizes engagement with disadvantaged communities is

critical to truly and meaningfully protecting the residents of the Study Area. This engagement process must be combined with the formation and long-term continuation of an NYNJHATS community engagement group or process throughout the span of project planning, design, and implementation. Without effective flood protection which responds to all varieties of flooding (storm surge, sea level rise, and rainfall), many New York City residents, particularly frontline communities, affected by future floods will face serious risks to life, health, and property with little or no access to financial assistance for repairs or shelter. We request the agencies to establish a continuing community-engagement structure; and demonstrate how FiDi FORGE will advance equitable resilience investment across New York City. Also, the NYNJHATS project must deliver multiple social, environmental, ecological, and economic benefits, including public safety, public health, community investment, and ecological protection, not simply the protection of high-valued property. We advocate for the achievement of five primary goals through the investments and implementation of the NYNJHATS plan:

- Protecting Public Health and Safety
- Safeguarding our Natural Systems and Biodiversity
- Providing all Citizens with Access to their Waterfronts
- Protecting Community Character and Infrastructure, and
- Redressing Past Inequality and Building Social Cohesion

With regard to the incorporation of natural or nature-based solutions [NNBS] in the FiDi FORGE project plan, we are concerned with the handling of Alternative 5, which seems to have been put forward only as a straw figure in order to be rejected (again, without providing sufficient underlying information, per our earlier comments) as impractical.

As there is some suggestion that NNBS features could be integrated with the other alternatives, we wonder why there isn't more of a hybrid alternative that takes the best features of each alternative and uses them where most appropriate? For example, rather than screen out Alternative 5, why couldn't an alternative be developed that is largely nature-based, but incorporates features of Alternative 3 and/or 4 in those areas where NNBS falls short or might preclude other important uses (i.e., transportation/maritime)?

Such a hybrid, nature-based and barrier alternative must be thoroughly considered, as it would minimize the fill footprint and preserve existing habitats while offering vastly superior ecological outcomes and greater long-term fiscal responsibility.

We call on EDC and USACE to make greater use of nature-based solutions (NBS) in the FiDi FORGE project, in order to holistically address flood risk management and deliver multiple co-benefits.

With regard to the environmental impact of the FiDi FORGE project: we are deeply concerned by the potential impacts on critical marine habitats. While the current leading proposal (Alternative 4/4A) relies heavily on a full-fill strategy, biological data from 2020–2021 clearly indicates that implementing such a strategy would destroy at least 20 acres of river-bottom habitat within the primary area of development. Furthermore, narrowing the river channel by up to 200 feet will accelerate current speeds, directly increasing shoreline erosion and threatening high-biodiversity zones that host vital reef-building benthic species such as mussels and oysters. The habitat for striped bass is also at risk, as their established

migration and breeding areas are already compromised by existing maritime traffic and infrastructure. Beyond the risks to striped bass, numerous other aquatic populations, notably the endangered Atlantic and shortnose sturgeon, face significant threats from these developments. Adding further fill along the East River will only exacerbate these blockages.

Finally, the Draft EIS should include a (phase-by-phase) mitigation plan showing how ferry, subway, pedestrian, bicycle, other vehicles, and emergency access will be maintained throughout construction.

Respectfully submitted,

The Resilient Coastal Communities Project

Outlook

FW: [Non-DoD Source] Riverkeeper Comments on the Draft Scope and Development of the Draft Integrated Interim Report for the FiDi Forge Project

From Weppler, Peter M CIV USARMY CENAN (USA) <Peter.M.Weppler@usace.army.mil>
Date Thu 7/23/2026 4:41 PM
To fidiforge@edc.nyc <fidiforge@edc.nyc>; Peterson, Casey <casey.peterson@arcadis.com>

1 attachment (297 KB)
Riverkeeper Letter on Scope for FiDi forge.pdf;

Arcadis Warning: Exercise caution with email messages from external sources such as this message. Always verify the sender and avoid clicking on links or scanning QR codes unless certain of their authenticity.

For mailbox

v/r,
Peter

Peter Weppler
Chief, Environmental Analysis Branch
U.S. Army Corps of Engineers – NY
Planning - c/o PSC Mail Center
(Room 17-420)
26 Federal Plaza
New York, NY 10278-0090
250 years
Peter.M.Weppler@usace.army.mil
917-790-8634
917-620-2862

From: Drew Gamils <dgamils@riverkeeper.org>
Sent: Thursday, July 23, 2026 4:34 PM
To: CENAN-FiDiFORGE-203-Study <CENAN-FiDiFORGE-203-Study@usace.army.mil>
Cc: Em Ruby <eruby@riverkeeper.org>; Nicole Freitas <nfreitas@riverkeeper.org>; info@chuckschumer.com; kg@kirstengillibrand.com; Daniel Goldman <daniel.goldman@mail.house.gov>; Nydia Velazquez <margarita.velazquez@mail.house.gov>; Weppler, Peter M CIV USARMY CENAN (USA) <Peter.M.Weppler@usace.army.mil>; Alexis Taylor <ataylor@edc.nyc>; FiDiFORGE@edc.nyc
Subject: [Non-DoD Source] Riverkeeper Comments on the Draft Scope and Development of the Draft Integrated Interim Report for the FiDi Forge Project

Good afternoon,

Riverkeeper, Inc. respectfully submits the attached comments on the draft scope and development of the Draft Integrated Interim Report for the FiDi Forge project.

Respectfully,

Drew Gamils
--
Drew Victoria Gamils
Senior Attorney
RIVERKEEPER
1966 • 2026
Celebrating 60 years of action
Office: 914-478-4501, ext. 247
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RIVERKEEPER

July 23, 2026

Via email CENAN-FiDiFORGE-203-Study@usace.army.mil

Peter Weppler
Chief of the New York District's Environmental Analysis Branch
U.S. Army Corp of Engineers
Planning Division
26 Federal Plz
New York, NY 10278

Re: Riverkeeper Comments on the Draft Scope and Development of the Draft Integrated Interim Report for the FiDi Forge Project

Dear Mr. Weppler,

Riverkeeper, Inc. ("Riverkeeper") respectfully submits the following comments on the draft scope and development of the Draft Integrated Interim Report (the "Interim Report") for the FiDi Forge project (the "Project"). Riverkeeper is a member-supported environmental watchdog organization dedicated to protecting and restoring the Hudson River from source to sea and safeguarding drinking water supplies through advocacy rooted in community partnerships, science, and law. For 60 years, Riverkeeper has defended the Hudson River Estuary, its fisheries, and the entire Hudson River ecosystem. We have stopped polluters, championed public access to the river, influenced land use decisions, and restored habitat, benefiting the natural and human communities of the Hudson River and its watershed.

The Project raises significant environmental concerns that the draft scope does not adequately address. Critical information is missing regarding the scope and methods of in-water construction and the anticipated impacts on aquatic habitat, migratory fish, benthic communities, water quality, stormwater management and shoreline resources. The scoping materials do not provide sufficient information for the public to meaningfully evaluate the alternatives or their environmental impacts, preventing the public from participating meaningfully in the scoping process. Without this information, the Environmental Impact Statement ("EIS") and Interim Report cannot provide a complete analysis of potential impacts or identify mitigation measures. Riverkeeper urges the U.S. Army Corps of Engineers ("USACE") and the New York City Economic Development Corporation ("NYCEDC") to expand the draft scope to ensure a comprehensive and transparent environmental review and develop an Interim Plan and EIS that thoroughly analyzes and compares the proposed alternatives and project impacts.

I. Project Background

The USACE, in coordination with NYCEDC, is undertaking a feasibility study to examine measures to manage future flood risk and reduce the economic costs and risks associated with flood and storm events that are affecting the Financial District and Seaport study area. The study area is approximately 0.9 miles of the East River waterfront in Lower Manhattan

and is located within the ongoing New York and New Jersey Harbor and Tributaries ("NYNJHATS") Coastal Storm Risk Management ("CSRM") Feasibility Study. The purpose of the project is to minimize the current and future coastal storm flood risk to the FiDi Forge study area of Lower Manhattan by creating a coastal storm risk management system integrated within the neighborhoods while preserving and enhancing critical maritime, roadway, and public transit transportation services, emergency access, and waterfront access for all users.

The EIS and the Interim Report will explore four alternatives: Alternative 1: No Action; Alternative 3: On-land Structural (along the bulkhead);[1] Alternative 4: Medium Shoreline Extension;[2] and Alternative 4A: Narrow Shoreline Extension.[3] Riverkeeper believes that without additional information regarding the impacts and costs associated with each alternative, the public cannot provide meaningful and thorough comments related to the development of the Draft Integrated Interim Report.

II. In-Water Construction and Environmental Impacts

All the proposed alternatives for the Project will require some in-water work, including fill and additional overwater coverage; however, the scoping materials lack basic information necessary to evaluate and compare the environmental impacts of in-water construction. The scope repeatedly references analyses that appear to rely on estimates of in-water work, but does not disclose fundamental project characteristics, including the anticipated in-water footprint, the extent of overwater structures, or the amount of fill required under each alternative.

For example, even though Alternative 4 and Alternative 4A appear to require substantially different amounts of fill, the draft scope fails to quantify those differences or explain how they would affect the East River. Although the EIS Scoping Additional Information Document describes Alternative 4 as a "medium" shoreline extension and Alternative 4A as a "narrow" extension, the scoping materials do not include the specific linear footage, fill volume, and footprint data necessary to translate these qualitative descriptions into a meaningful comparison of environmental impacts.

The EIS should clearly identify the volume of fill associated with each alternative, the location of proposed fill, the resulting loss or alteration of aquatic habitat, and the anticipated impacts to benthic communities, migratory fish, water quality, river hydraulics, and other

[1] Alternative 3 proposes an exposed floodwall constructed along the existing bulkhead, maintaining at least a five-foot clearance from the elevated FDR Drive, as required by New York State Department of Transportation. Ring walls would be installed around the base of each pier with floodgates set above the tidal flooding elevation to enable pedestrian, vehicle, and emergency access during non-flood conditions. This alternative would not construct a waterfront esplanade on the outboard, or "wet" side, of the floodwall.

[2] Alternative 4 involves a medium-scale extension of the shoreline into the East River in a portion of the study area, and elevating the waterfront. This alternative buries the proposed floodwall under publicly accessible green open space. This alternative expands to the waterfront by introducing a new waterfront esplanade built on the outboard, or "wet" side, of the floodwall and includes provisions for public access to both the top of the line of defense (via up and over walking paths) and the lower waterfront through a series of floodgates (elevated above the tidal flooding elevation).

[3] Alternative 4A proposes a narrow shoreline extension into the East River, designed to elevate the shoreline to a passive level of protection for future tidal flooding. The extension would incorporate a partially buried floodwall with inaccessible green space on both sides of the floodwall, and a new waterfront esplanade built on the outboard, or "wet" side, of the floodwall. Connectivity to the waterfront would be maintained at priority street corridors where floodgates provide direct access to the new esplanade and reconstructed piers.

ecological resources. Without this information, neither the public nor reviewing agencies can compare the environmental consequences of the alternatives.

Similarly, the EIS must identify the proposed footprints for each alternative, including temporary and permanent impacts, and describe the anticipated methods of construction, including dredging, pile driving, shoreline armoring, and other in-water activities. The environmental analysis cannot be complete without this information. Furthermore, the Interim Report and EIS should also address how each alternative accounts for future growth in maritime operations, given anticipated increases in ridership and population in Lower Manhattan; a footprint and design that is adequate for current operations may not be sufficient to accommodate reasonably foreseeable demand.

The EIS must also evaluate mitigation measures associated with any proposed fill. Simply identifying impacts is insufficient. Any mitigation analysis should be informed by the ongoing biological and habitat sampling program, which has reportedly completed two years of data collection (2021 and 2022). Those data must be made publicly available and used to evaluate and compare the alternatives. In addition, the EIS must explain how unavoidable habitat losses would be mitigated, whether compensatory habitat restoration is proposed, and how the proposed mitigation would achieve no net loss of aquatic functions and values. If compensatory habitat restoration is proposed, the EIS must identify potential restoration sites within New York City.

III. Stormwater Management and Drainage Structure

The draft scope similarly lacks sufficient detail regarding stormwater management and drainage infrastructure, an issue directly connected to both flood protection performance and combined sewer overflow risk to the East River. Rising sea levels are expected to impede the function of the combined sewer system and limit the ability of overland stormwater to drain to New York Harbor, increasing the risk of flooding for residents and businesses even where coastal storm risk management infrastructure is otherwise effective. Modeling conducted for the adjacent Financial District and Seaport Climate Resilience Master Plan found that, absent new drainage infrastructure, rainfall flooding behind a flood defense system could exceed five feet in depth in some areas and that new infrastructure would need to manage a volume of stormwater equivalent to 750 to 1,250 New York City subway cars.[4] No explanation is provided regarding how this risk will be addressed, or whether comparable modeling has been conducted, nor does it disclose the projected stormwater volumes each alternative's drainage system is designed to manage. The EIS must include this missing information.

The draft scope also fails to explain how the risk of combined sewer overflow will be addressed, or how the proposed drainage strategy differs across the alternatives being considered. Each alternative reportedly includes a pump station to manage drainage associated with the coastal storm risk management infrastructure;[5] however, the scoping materials fail to include

[4] N.Y.C. Econ. Dev. Corp. & Mayor's Office of Climate & Envtl. Justice, Financial District and Seaport Climate Resilience Master Plan ch.5, "A Resilient 21st-Century Waterfront," at 92 (2024), https://fidiseaportclimate.nyc/sites/default/files/2024-03/FiDi-Seaport-Climate-Resilience-Master-Plan_Chapter-5.pdf (discussing "Without Drainage Improvements, What would Flooding from Rainfall Look Like?").

[5] U.S. Army Corps of Engineers and N.Y.C. Econ. Dev. Corp., FiDi-Forge Additional Information Document, at 17-18 (2026) "(identifying the "Final Array of Alternatives to be Considered Further and Evaluated in the EIS").

information on pump station capacity, design, or how these choices vary by alternative. The master plan identifies several possible locations for the pump station south of Old Slip since this portion of the study area offers sites that minimize conflicts with existing structures.[6]

The EIS must disclose the anticipated volume and frequency of pump discharge into the East River during storm events, and evaluate the potential water quality effects of discharging combined sewage and stormwater at this location, including any measures proposed to minimize impacts to water quality and marine life in the discharge area. The environmental review must also clarify how the space required for pump station infrastructure will be reconciled with the project's goals of waterfront and esplanade accessibility, and whether the pump stations will constrain the design of public open space in the study area.

IV. Development of the Selected Alternatives

The purpose of scoping is to identify the issues to be analyzed in the EIS. Meaningful participation in that process requires enough information for the public to understand what each alternative entails and how it was developed. Here, key information necessary to evaluate the alternatives is missing.

Missing from the draft scope is the methodology or decision-making process used to develop, compare, and eliminate alternatives. It merely assigns qualitative rankings to each thematic approach, without the underlying data necessary to evaluate them. It is unclear what criteria were used to screen alternatives, how environmental impacts were weighed against engineering, cost, navigation, or resiliency objectives, and why certain concepts were dismissed while others advanced. Without this information, the public cannot determine whether the alternatives presented represent a reasonable range of options or whether potentially less environmentally damaging approaches were prematurely discarded.

In practice, resilient shoreline design often incorporates multiple strategies tailored to different locations and site constraints. The scoping materials do not explain why hybrid alternatives combining elements of the various concepts were not developed or evaluated. Instead, it presents an all-or-nothing framework that unnecessarily limits consideration of potentially superior alternatives capable of achieving flood protection while minimizing environmental impacts. For example, there is no information explaining why nature-based features cannot be incorporated into areas where they are compatible with maritime uses while more traditional infrastructure is reserved only for locations where those uses genuinely require it.

V. Cost Information

An evaluation of alternatives also requires transparency regarding cost. Although cost is frequently cited as a consideration in alternative selection, the scoping materials neither disclose the estimated costs associated with each alternative nor explain how cost-effectiveness influenced the screening process. At a minimum, the EIS must identify planning-level cost

[6] N.Y.C. Econ. Dev. Corp. & Mayor's Office of Climate & Envtl. Justice, Financial District and Seaport Climate Resilience Master Plan ch.5, "A Resilient 21st-Century Waterfront," at 94-95 (2024), https://fidiseaportclimate.nyc/sites/default/files/2024-03/FiDi-Seaport-Climate-Resilience-Master-Plan_Chapter-5.pdf (discussing the Stormwater Management Proposal).

estimates for each alternative, describe the assumptions underlying those estimates, and explain how cost was balanced against environmental protection, resiliency, engineering feasibility, and other project objectives.

VI. Alternative 3 Should Not Advance

Riverkeeper does not support Alternative 3 as currently presented. Based on the information available, Alternative 3 appears to rely most heavily on structural shoreline modifications, while providing little information regarding the environmental consequences of those modifications. The draft scope does not adequately explain why this alternative represents the preferred approach or how the environmental impacts compare to other alternatives. USACE should disclose the comparative cost, habitat-impact, and resiliency-performance data underlying its apparent preference for Alternative 3.

Before Alternative 3 is carried forward for detailed analysis, USACE and NYCEDC should demonstrate why less environmentally damaging approaches, including hybrid alternatives that incorporate nature-based features, cannot reasonably achieve the project's objectives. Without comparable fill, dredging, and overwater-structure data, the public cannot evaluate the difference or compare Alternative 3 against shoreline-extension Alternatives 4 and 4A using equivalent information.

The USACE and NYCEDC should rigorously evaluate a reasonable hybrid alternative that incorporates engineering with nature wherever practicable while preserving necessary maritime infrastructure. The draft scope should clearly explain, with supporting engineering and environmental analyses, why such an approach would or would not satisfy the project's objectives. Without this analysis, the alternatives evaluation is incomplete and does not provide the public with a basis for comparing the environmental consequences of the available options.

VII. Nature-Based Features and Engineering with Nature

USACE and NYCEDC evaluated a nature-based solutions approach in the form of an ecotone levee that wraps around the entire study area. Ultimately, this alternative was found to be infeasible because it required an extensive footprint to reach the design flood elevation and that footprint would result in the loss of maritime operations, significant impacts to existing aquatic habitats, and disruption of critical underground transit infrastructure. Riverkeeper is particularly concerned that this alternative was eliminated without more information included in the draft scope describing the impacts to maritime activities and aquatic habitats.

The environmental analysis must clearly explain what maritime uses or infrastructure would be affected by nature-based features, why those conflicts cannot be resolved through project design, and what analyses support the decision to screen out this alternative. General statements asserting that engineering with nature is incompatible with maritime activities are insufficient. The USACE and NYCEDC should explain why a hybrid approach could not incorporate nature-based features in those subareas where maritime activities do not conflict, rather than screening out the approach in its entirety based on impacts concentrated in specific locations. The EIS should identify and evaluate opportunities to integrate nature-based features into portions of the project wherever they are compatible with maritime and operational needs.

The USACE has spent the last decade promoting engineering with nature as an official initiative. Similarly, under the NY-NJ HATS project, ecosystem restoration is one of the study's stated objectives alongside coastal storm risk management. For these reasons, engineering with nature should not be dismissed simply because it may require more site-specific design. Given the significant ecological benefits associated with habitat restoration, shoreline complexity, and improved aquatic connectivity, the EIS should fully evaluate opportunities to incorporate nature-based features wherever feasible.

VIII. Habitat Restoration

In addition, the EIS should evaluate the potential for compensatory habitat restoration to occur within the bounds of the project site as part of incorporating nature-based features. This is especially important given the presence of Atlantic and shortnose sturgeon in the project area, both of which are protected under the Endangered Species Act. Any habitat restoration or mitigation commitment should specifically address the extent to which in-water construction, including pile driving and dredging, may affect sturgeon presence and movement in the lower East River, and should be informed by and coordinated with the results of the three-year biological and habitat sampling conducted.

IX. Regional Commitment to Coastal Resilience

Finally, Riverkeeper emphasizes that this project should not be viewed in isolation. Any unavoidable impacts to the Hudson River and East River resulting from the FiDi Forge project should be accompanied by a clear commitment from USACE and NYCEDC to advance beneficial habitat restoration and resilience projects elsewhere within the NY-NJ HATS study area. Because this project is one component of a broader regional coastal resilience strategy, mitigation commitments should likewise extend beyond Lower Manhattan and include restoration opportunities throughout the HATS project area.

X. Conclusion

The critical information missing from the draft scope must be addressed in the Feasibility Study and EIS to ensure a comprehensive and transparent environmental review. By fully evaluating hybrid alternatives that incorporate nature-based features wherever feasible, provide for meaningful habitat restoration, and support regional coastal resilience, the EIS can help ensure that the FiDi Forge project protects Lower Manhattan from flooding while maintaining the critical functions of the waterfront and protecting and restoring the ecological resources of the Hudson River Estuary and East River. Riverkeeper appreciates the opportunity to comment and looks forward to working with USACE and NYCEDC throughout the environmental review process.

Sincerely,

Drew Gamils

Drew Gamils
Senior Attorney

Riverkeeper, Inc.
Dgamils@riverkeeper.org

cc:

Senator Chuck Schumer
Senator Kristin Gillibrand
Congressmember Nydia Velazquez
Congressmember Dan Goldman
Alexis Taylor, New York City Economic Development Corporation

Outlook

[Non-DoD Source] Regional Plan Association FiDi FORGE Public Comments

From Robert Freudenberg <RobertF@RPA.ORG>
Date Thu 7/23/2026 4:14 PM
To CENAN-FiDiFORGE-203-Study <CENAN-FiDiFORGE-203-Study@usace.army.mil>
Cc Alexis Taylor <ataylor@edc.nyc>; Weppler, Peter M CIV USARMY CENAN (USA) <Peter.M.Weppler@usace.army.mil>; Tom Wright <Tom@RPA.ORG>; Sam Bowden Akbari <bowdenakbari@rpa.org>; Kate Slevin <kslevin@RPA.ORG>; Maulin Mehta <maulin@rpa.org>

1 attachment (610 KB)
July 23, 2026 - RPA Comments on FiDi FORGE_FINAL.pdf;

To Whom It May Concern:

Please find attached RPA's comments related to the scope and preparation of the Draft Integrated Interim Report for FiDi FORGE.

Thank you.

Sincerely,

Robert Freudenberg
He/Him/His
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212.253.2727 | rpa.org

July 23, 2026

Re: Regional Plan Association public comments related to the scoping of the Financial District and Seaport Fortifying our Resilient Growth and Economy (FiDi FORGE) project

To the members of the FiDi FORGE Project Team from the New York City Economic Development Corporation (EDC), the US Army Corps of Engineers (Corps), and their consultants, Regional Plan Association (RPA) would like to thank you for the opportunity to provide written comments on the scoping of the FiDi FORGE project as it moves into EIS analyses and the preparation of a Draft Integrated Interim Report. These comments build on those shared in the public forum on July 16, 2026.

RPA is a 100-year old organization dedicated to improving the quality of life, environmental resiliency, and economic health of the New York metropolitan region. We weigh in on projects and issues when they: significantly advance our four core values of health, equity, prosperity, and sustainability; are in line with our regional plan recommendations; lead to long term, region-shaping outcomes, leverage short-term opportunities; and have support from key partners and decision-makers. The FiDi Forge project meets every one of these criteria and is an essential project to move forward, and get right.

Project Need & Urgency

First, we are thrilled to see an assessment of this project advance, as it represents the final link on the chain of protection for Lower Manhattan, a critical and highly vulnerable area of New York City that was devastated by Superstorm Sandy, and is an essential employment, transportation, and neighborhood hub with assets that link all the way back to the City's modern origins. Much work has been and is being done to protect Lower Manhattan, but this project needs to move ahead as quickly as possible, to protect the area at risk, and to support the full efficacy of the resilience projects around it. We have been fortunate that no storm since Sandy has wrought such devastation, but every year without protection is a year of increasing risk in a worsening climate crisis. But project need and the need for urgency must not justify cutting corners on project features or process, including community feedback.

Deliver on a New Model Partnership for Resilience

We are also pleased that EDC and the Army Corps are partnering on this effort through Section 203 of the Water Resources Development Act of 1986, bringing the best of local knowledge together with efficient federal resources and expertise to get the job done. It is essential that this partnership serve as more than the sum of its parts. We see this approach as an opportunity for a new model of resilience planning that draws from the best of each partner and we encourage clear communication, respect for processes that have led to

this point, and openness to possibilities in project design that innovates beyond the bare minimum. We hope that the process's successes and shortcomings will be documented to ensure improvements going forward.

Specific Recommendations

As the project moves into review, we are seeking assurances on a few key issues given the shift from a city-led effort to a joint effort with the Corps. In that light, we also strongly encourage that key features of the City's plan remain in the alternatives being assessed.

1. Clarify the differences between proposed alternatives and FiDi Seaport Climate Resilience Master Plan

First, we ask that EDC and the Army Corps make clear that the alternatives being studied stem directly from the meaningful public process and deep technical analysis that resulted in the FiDI Seaport Climate Resilience Master Plan. Alternatives 4 and 4a seem to track most closely to that vision, but given the years of engagement and ultimate community buy-in for that plan, it will be essential to understand what is different and what remains the same.

2. Provide additional information about the process to choose alternatives in the scoping phase

Given potential changes in approach between the vision from the FiDi Seaport Climate Resilience Master Plan and the alternatives chosen to be assessed through an EIS, we hope to understand more about how those alternatives were evaluated and selected, including the following:

- Screening Approaches

  The scoping document provides a brief summary of the process to screen and ultimately choose which alternatives will be analyzed in the EIS. While this information is helpful, we seek greater detail, including the criteria, methodology, assumptions used to analyze, compare, and identify the chosen alternatives, and, to establish a proposed scope for the evaluation of the project's environmental impacts. Gaining a deeper understanding of what was learned and how that knowledge was used to choose/screen out alternatives, will help us better understand the particular strengths and weaknesses of a given alternative - whether it was chosen or screened out - and for those projects moving to the EIS, will serve as baseline information to better evaluate and provide comments on determinations in the Draft Integrated Interim Report.

- Cost-effectiveness and environmental impacts

  We are also interested to learn more about the cost/cost-effectiveness differences between each alternative and any initial environmental analyses for each alternative that were used to screen them out. In particular, for Alternatives 4 and 4a, we are seeking any information on assumptions around environmental impact, including any additional information about the volume of fill assumed for each, the degree of habitat loss, and any potential mitigation, understanding that a full EIS will study these questions in greater detail.

- Maritime uses

  Given the importance of preserving maritime uses in the study area, we are interested to learn any additional detail about those uses, which are to be preserved and how much each contributes to NYC's economy. RPA supports the continued use of the waterfront for maritime uses and encourages approaches that integrate resilience and maritime uses.

3. Ensure that the alternatives studied include hybrid engineered-natural features

The alternatives ultimately selected in scoping appear to have no overlap with each other, resulting in basic, inflexible options (on shore, versus in-water; engineered versus nature) that largely serve one purpose. This is a mistake. Most resilience projects in NYC and around the world are made-up of a diversity of approaches that combine a hybrid of engineered and nature-based approaches. These systems balance the need to manage flooding, with ecology, and human use. We strongly encourage the team to break out of simple, uncreative approaches that are easier to study but result in projects that are rejected by the public.

More specifically, in terms of design, we strongly encourage that the thoughtful features of the Master Plan are included in the assessment of Alternatives 4 and 4a. What made the Master Plan vision so attractive was the innovation in design, sensitivity to ecology and incorporation of nature-based features, as well as the attention to public access and connection to the waterfront.

Understanding that final design considerations often follow the assessment of function, we want to stress that the review must incorporate or - at a minimum - does NOT make assumptions that would preclude the following objectives:

- Minimizing impact to existing aquatic ecosystems;
- Enhancing or supporting habitat through structural features, areas for penetration of light, protection from wave action, creation of new, nature-based spaces, and restoration and stewardship opportunities;
- Ensuring public space, public access, and connection to the waterfront;
- Innovations in design that provide multiple layers of protection from different flood risks, including an esplanade built to withstand periodic flooding and aspects that address stormwater flooding behind protective coastal layers; and
- The preservation and enhancement of maritime uses and infrastructure.

These objectives reflect what the community has indicated they seek and should be factored in to the analyses being performed.

4. Be responsible to the public, engaging widely and sharing critical information

There has already been significant community engagement that resulted in the Master Plan for the FiDI/Seaport area. As the effort now shifts into a different phase, ongoing meaningful engagement with the community is essential. There are too many neighborhoods in NYC bearing the scars of changed projects after robust community engagement. This effort must do better. Some of our recommendations above speak to this concern, and there is more that can be done. As information is learned, (including around the differences between the current alternatives and the Master Plan vision) the community should be kept apprised through both formal and informal means, in between major milestones along the timeline.

Conclusion

We understand the urgency and need to move forward in assessing alternatives, and the opportunity that collaborating with the Army Corps presents. We do, however, want to ensure that the project that is assessed and eventually moves forward is supported by an informed public, and incorporates a mix of the best possible combination of flood risk reduction, ecological protection and enhancement through nature-based features and

ecological design, and robust public access, not simply just the least that could be invested to yield the greatest potential protection. Resilience infrastructure must also be community-building infrastructure.

Thank you for considering our comments and we look forward to continued engagement going forward.

Sincerely,

Robert Freudenberg

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Outlook

[Non-DoD Source] SWIM Comments on the FiDi FORGE Project

From Michelle Luebke <michelle@swimmablenyc.org>
Date Thu 7/23/2026 6:01 PM
To CENAN-FiDiFORGE-203-Study <CENAN-FiDiFORGE-203-Study@usace.army.mil>
Cc Alexis Taylor <ataylor@edc.nyc>

1 attachment (275 KB)
FiDi FORGE EIS Scoping Comments.pdf;

Please accept the attached comment letter on behalf of the SWIM Coalition.

Respectfully submitted,
~michelle

Michelle A. Luebke (she/her)
Program Manager
--
SWIM Coalition
michelle@swimmablenyc.org

https://www.swimmablenyc.org/

SWIM Coalition
Stormwater Infrastructure Matters

Stormwater Infrastructure Matters (SWIM) Coalition
121 6th Ave, Suite #501
New York, NY 10013
www.swimmablenyc.org

July 23, 2026

Via email to CENAN-FiDiFORGE-203-Study@usace.army.mil

Peter Weppler
Chief of the New York District's Environmental Analysis Branch
U.S. Army Corp of Engineers, Planning Division
26 Federal Plaza
New York, NY 10278

RE: Comments on the Development and Scope of the FiDi Fortifying Our Resilient Growth and Economy (FORGE) Draft Integrated Interim Report

Dear Peter,

On behalf of the Stormwater Infrastructure Matters (SWIM) Coalition steering committee and our members please accept the following comments regarding the FiDi FORGE Draft Integrated Interim Report. SWIM Coalition represents over 70 organizations dedicated to ensuring swimmable and fishable waters around New York City through natural, sustainable stormwater management practices. Our members are a diverse group of community based, citywide, regional, and national organizations; water recreation user groups; institutions of higher education; and businesses. SWIM Coalition member organizations endorse a truly sustainable view of watershed management, one that restores ecological systems, creates local economic opportunities and equitably distributes the benefits of green infrastructure.

Understanding that the FiDi FORGE Project is part of the larger New York and New Jersey Harbor and Tributaries (NYNJHATS) Coastal Storm Risk Management (CSRM) Feasibility Study, the purpose of this project is to minimize the current and future coastal storm flood risk to the FiDi FORGE study area of Lower Manhattan by creating a CSRM system integrated within the neighborhoods while preserving and enhancing critical maritime, roadway, and public transit transportation services, emergency access, and waterfront access for all users. As with other U.S. Army Corps of Engineers (USACE) projects, upon review of the available materials, the FiDi FORGE Project raises significant environmental concerns that the draft scope does not adequately address. Critical information is missing regarding the scope and methods of

in-water construction and the anticipated impacts on aquatic habitat, migratory fish, benthic communities, water quality, stormwater management, and shoreline resources. The scoping materials do not provide sufficient information for the public to meaningfully evaluate the alternatives or their environmental impacts, preventing the public from participating meaningfully in the scoping process. Without this information, the Environmental Impact Statement (EIS) and Interim Report cannot provide a complete analysis of potential impacts or identify mitigation measures. Along with our partners at Riverkeeper, the SWIM Coalition urges the USACE and the New York City Economic Development Corporation (NYCEDC) to expand the draft scope to ensure a comprehensive and transparent environmental review and develop an Interim Plan and EIS that thoroughly analyzes and compares the proposed alternatives and project impacts.

1. **Public engagement issues**

A group of advocates representing key organizations reached out prior to the close of the comment period to seek clarity on fundamental process decisions and exclusions made prior to public release, but no response was provided due to the strict adherence to the USACE process. When clarity was sought at the public hearing, we were informed that questions about the process or the project would not be answered at the meeting, that the Q&A prompt was only for technical questions about issues with Zoom. All of this clearly demonstrates that those leading this project are not open to meaningful public engagement and comments from those who may be potentially affected by these plans. This continued regressive process of soliciting feedback after a plan is selected is an inefficient waste of funding, since incorporating public input earlier in the process often identifies opportunities to improve project design.

2. **Lack of publicly available information**

The information provided at this time is inadequate for our organizations to develop thorough comments on the scope; the lack of information on environmental impacts is concerning. We request additional information be made publicly available regarding the project's alternatives and the criteria/methodology/assumptions used to analyze, compare, and identify the chosen alternatives, and to establish a proposed scope for the evaluation of the project's environmental impacts. A thorough evaluation of the project scope also requires more information on the impact of induced flooding on other unprotected and/or previously-unaffected communities. Gaining a deeper understanding of what was learned and how that knowledge was used to choose/screen out alternatives, as well as knowing the project sponsor's specific plans for evaluating environmental impacts, is essential to the process of evaluating the project and submitting full and complete public comments.

Specifically we are interested in learning more about the cost/cost-effectiveness differences between each alternative (and sub-alternatives); initial environmental analyses for each alternative, including more information about the fill for Alternatives 4 and 4a (volume of fill required for each, degree of habitat loss, potential mitigation, etc.); the scope of intended environmental impact analyses and a better understanding of which maritime features are

intended to be preserved; and which maritime features would be lost in Alternative 5, and why such loss led to Alternative 5 being screened out.

3. **Stormwater management and drainage**

The draft scope similarly lacks sufficient detail regarding stormwater management and drainage infrastructure, an issue directly connected to both flood protection performance and combined sewer overflow (CSO) risk to the East River. The draft scope also fails to explain how the risk of CSOs will be addressed, or how the proposed drainage strategy differs across the alternatives being considered. Rising sea levels are expected to impede the function of the combined sewer system and limit the ability of overland stormwater to drain to New York Harbor, increasing the risk of flooding for residents and businesses even where CSRM infrastructure is otherwise effective. Modeling conducted for the adjacent Financial District and Seaport Climate Resilience Master Plan found that, absent new drainage infrastructure, rainfall flooding behind a flood defense system could exceed five feet in depth in some areas and that new infrastructure would need to manage a volume of stormwater equivalent to 750 to 1,250 New York City subway cars.[1] No explanation is provided regarding how this risk will be addressed, or whether comparable modeling has been conducted, nor does it disclose the projected stormwater volumes each alternative's drainage system is designed to manage. The EIS must include this missing information for proper public review and input.

4. **Environmental impact on aquatic ecosystems**

We join with Riverkeeper, the Columbia Climate School, Center for Sustainable Urban Development, and others in our deep concern about potential impacts on critical aquatic habitats. While the current leading proposals (Alternatives 4 and 4A) rely heavily on a full-fill strategy, biological data from 2020–2021 clearly indicates that implementing such a strategy would destroy at least 20 acres of river-bottom habitat within the primary area of development. Furthermore, narrowing the river channel by up to 200 feet will accelerate current speeds, directly increasing shoreline erosion and threatening high-biodiversity zones that host vital reef-building benthic species such as mussels and oysters. The habitat for striped bass is also at risk, as their established migration and breeding areas are already compromised by existing maritime traffic and infrastructure. Beyond the risks to striped bass, numerous other aquatic populations, notably the endangered Atlantic and shortnose sturgeon, face significant threats from these developments. Adding further fill along the East River will only exacerbate these blockages.

5. **Engineering with Nature**

It is not clear from the information provided to the public why the ecotone levee was the only natural, nature-based design considered in the "Engineering with Nature" section. Please explain how you justified that Alternative 5, Engineering with Nature, would require the ferry terminal to

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[1] https://fidiseaportclimate.nyc/sites/default/files/2024-03/FiDi-Seaport-Climate-Resilience-Master-Plan_Chapter-5.pdf

be removed in the scenario with a levee and why the levee was allowed to advance as a viable alternative knowing that it would preclude use of the ferry terminal. The loss of maritime resources was briefly mentioned at the public hearing as the primary justification for screening out Alternative 5, but the premise was never explicitly stated why 1) the ecotone levee was selected and 2) why other green infrastructure practices were not considered. We call on EDC and USACE to make greater use of nature-based solutions in the FiDi FORGE project, in order to holistically address flood risk management and deliver multiple co-benefits.

The USACE has spent the last decade promoting engineering with nature as an official initiative. Similarly, under the NY-NJ HATS project, ecosystem restoration is one of the study's stated objectives alongside coastal storm risk management. For these reasons, engineering with nature should not be dismissed simply because it may require more site-specific design. Given the significant ecological benefits associated with habitat restoration, shoreline complexity, and improved aquatic connectivity, the EIS should fully evaluate opportunities to incorporate nature-based features wherever feasible.

6. **Alternative 3 should not advance**

SWIM, Riverkeeper, and other advocates do not support Alternative 3 as currently presented. Based on the information available, Alternative 3 appears to rely most heavily on structural shoreline modifications, while providing little information regarding the environmental consequences of those modifications. The draft scope does not adequately explain why this alternative represents the preferred approach or how the environmental impacts compare to other alternatives. USACE should disclose the comparative cost, habitat-impact, and resiliency-performance data underlying its apparent preference for Alternative 3. Before Alternative 3 is carried forward for detailed analysis, USACE and NYCEDC should demonstrate why less environmentally damaging approaches, including hybrid alternatives that incorporate nature-based features, cannot reasonably achieve the project's objectives. Without comparable fill, dredging, and overwater-structure data, the public cannot evaluate the difference or compare Alternative 3 against shoreline-extension Alternatives 4 and 4A using equivalent information.

7. **Hybrid alternative needed**

Each alternative is set up to be entirely distinct from one another. While there is some mention that natural features (as represented in Alternative 5) could be integrated with the other alternatives, we wonder why there isn't more of a hybrid alternative that takes the best features of each alternative and uses them where most appropriate. Rather than screen out Alternative 5, an alternative should be developed that is largely nature-based, but incorporates features of Alternative 3 and/or 4 in those areas where nature-based solutions fall short or preclude other important uses (i.e., transportation/maritime). This hybrid approach should also consider managed retreat where feasible, allowing vacated land to become a place for intentional flooding. We think such an alternative might be a more realistic one to evaluate versus Alternative 3, which seems largely infeasible, and that by screening out Alternative 5, the opportunity for nature-based features is significantly diminished.

8. **Equity across the city**

We understand that by focusing on FiDi as an economic and transportation hub of the city, this project scores well in cost-effectiveness under federal guidelines. We are concerned, however, that this formulation would preclude other communities throughout the city that are not as wealthy from receiving any federal funding for resiliency simply because the math doesn't value their lives and communities the same. There are environmental justice communities all throughout New York City who are subjected to flooding and contaminated water, resulting in loss of lives, who would benefit from resiliency measures in their neighborhoods. Further, the billions of dollars worth of proposed waterfront amenities associated with Alternative 4A and, especially, Alternative 4, in this area of the City which already benefits from numerous recreational and cultural amenities, is fundamentally inequitable in view of the relative absence of such amenities from waterfront areas in state- and federally-identified disadvantaged communities throughout the City such as East Harlem, Port Morris, Mott Haven, and others. While we understand a project such as this will include community amenities, such as vegetated promenades, that the city and federal government are about to invest billions of dollars in a community with the highest median income in all of the city should give us all pause.[2] Immediate to the north along the East River is a community district (CD) that is ranked 47th out of 59 CDs in median income. Will they reap any benefits from this project? Or will they bear the burden of unintended consequences, such as induced flooding?

Funding should be provided for such amenities in the communities cited above and other waterfront amenity-deprived communities around New York City before additional public funds are devoted, as with Alternatives 4 and 4A, to augmenting the existing waterfront amenities in the FiDi FORGE project area. Please identify what other resources you are tapping into so as not to take money away from other areas across the city, resulting in inequitable funding allocations.

Thank you for the opportunity to submit these written comments. We look forward to working with you to find the best strategy to achieving resiliency across NYC.

Respectfully submitted,



Michelle A. Luebke | Program Manager
advocacy@swimmablenyc.org

On behalf of the SWIM Coalition Steering Committee:

[2] https://data.cccnewyork.org/data/map/66/median-incomes#66/39/3/107/132/101/a

Mike Dulong – Riverkeeper
Dara Illowsky − Save the Sound
Christian Murphy – Bronx River Alliance
Holly Porter Morgan – Lehman College
Leonel Lima Ponce – Pratt Institute
Em Ruby – Riverkeeper
Shino Tanikawa – NYC Soil & Water Conservation District

Cc:
Senator Schumer
Senator Gillibrand
Congressmember Nydia Velazquez
Congressmember Dan Goldman
Mayor's Office
Deputy Mayor of Economic Justice, Julie Su
Alexis Taylor, New York City Economic Development Corporation

Outlook

[Non-DoD Source] City Club FORGE DSCOW Testimony

From Tom Fox <tom@tomfoxnyc.com>
Date Thu 7/23/2026 1:10 PM
To CENAN-FiDiFORGE-203-Study <CENAN-FiDiFORGE-203-Study@usace.army.mil>
Cc Alice Blank <ablank7@gmail.com>; Mary Habstritt <mary@lilacpreservationproject.org>; Klaus H. Jacob <jacob@ldeo.columbia.edu>; Liam Blank <liam.blank@gmail.com>; Layla <laylademay@gmail.com>; Rachel M <rachelmargolin.ny@gmail.com>; JOHN SHAPIRO <johnshapiro1@me.com>

1 attachment (433 KB)
FiDi_FORGE_CITY_CLUB_DRAFT_SCOPE_COMMENTS_2026.pdf;

To whom it may concern,

Attached are the City Club of New York's comments on the draft scope of work for the FiDi FORGE Resiliency project's environmental impact statement.

Thank you,

Tom Fox
City Cub of New York, Trustee
Co-chair, Waterfront Committee

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July 23, 2026

U.S. Army Corps of Engineers
New York District

Via Email: CENAN-FiDiFORGE-203-Study@usace.army.mil

Re: Comments on the Draft Scope of Work for the FiDi FORGE Environmental Impact Statement and Integrated Interim Feasibility Report

Dear FiDi FORGE Study Team:

The City Club of New York appreciates the opportunity to comment on the Draft Scope of Work for the Environmental Impact Statement (EIS) and Integrated Interim Feasibility Report for the Financial District and Seaport Fortifying Our Resilient Growth and Economy (FiDi FORGE) Coastal Storm Risk Management Project.

The City Club recognizes that sea level rise, coastal flooding, and increasingly frequent and intense storms present growing challenges throughout New York City. Addressing these risks will require thoughtful planning, sound science, significant public investment, and careful consideration of priorities across the City's waterfront.

As one of the largest and most consequential climate adaptation and public infrastructure projects proposed in New York City, FiDi FORGE has the potential to shape Lower Manhattan for generations and to influence future resilience planning throughout the region. Because of its scale, cost, and long-term implications, the Environmental Impact Statement should provide a comprehensive, transparent, and objective evaluation of the project's alternatives, environmental impacts, costs, benefits, and tradeoffs.

The Draft Scope of Work provides a thoughtful framework for environmental review and identifies many of the issues that warrant detailed analysis. Given the scale and long-term significance of FiDi FORGE, however, the Environmental Impact Statement should do more than identify environmental impacts and mitigation measures. It should clearly explain how alternatives were developed and evaluated, identify the assumptions, methodologies, and decision criteria used throughout the planning process, and provide sufficient information for decision-makers and the public to understand the tradeoffs among competing approaches.

The Financial District and Seaport Climate Resilience Master Plan (FDSCRMP) was developed through years of technical analysis, interagency coordination, and public engagement, and established three overarching goals: protecting Lower Manhattan from tidal flooding and coastal storms; integrating climate resilience infrastructure into the city; and enhancing the public waterfront through new open space and community-serving uses. The Environmental Impact Statement should evaluate the extent to which the proposed alternatives advance—or depart from—these planning objectives and explain the reasons for those differences.

The City Club offers the following recommendations to strengthen the Final Scope of Work and help ensure that the subsequent Draft EIS provides a comprehensive, transparent, and technically rigorous evaluation of the proposed project and its alternatives.

1. Plan FiDi FORGE as Part of an Integrated Lower Manhattan Resilience System

The Draft Scope appropriately describes the evolution of climate resilience planning in Lower Manhattan, including the Lower Manhattan Climate Resiliency Study, the Financial District and Seaport Climate Resilience Master Plan, and adjacent resilience initiatives. However, the environmental review itself is largely confined to the FiDi FORGE project area. The Draft Scope also states that the Seaport Coastal Resilience Project will not be included because it has not yet been approved.

While this approach may simplify the environmental review, it risks overlooking how individual resilience investments function as parts of a larger system. Flood protection, transportation, ecological restoration, waterfront access, emergency response, and stormwater management do not stop at project boundaries. Decisions made within FiDi FORGE will influence the effectiveness of adjacent resilience projects, just as those projects will influence the long-term success of FiDi FORGE.

Accordingly, the City Club recommends that the Final Scope of Work expand its cumulative analysis to evaluate how FiDi FORGE integrates with surrounding resilience initiatives, including the Seaport Coastal Resilience Project, Battery Park City Resiliency, The Battery Coastal Resilience Project, the Brooklyn Bridge–Montgomery Coastal Resilience Project, and the broader New York and New Jersey Harbor and Tributaries Study (HATS). In particular, the scoping should address how the different alternatives would affect the cost/benefit analysis of each existing HATS alternative including but not limited to the Tentatively Selected Plan.

The EIS should explain whether FiDi FORGE is intended to function as an independent project, an initial phase of HATS implementation, or a complementary project whose design assumptions will influence future HATS recommendations. The scoping process should examine how the alternatives affect the HATS study and explain how FiDi FORGE has been coordinated with the HATS planning process.

The analysis should also explore opportunities to leverage existing infrastructure—including the FDR Drive corridor—to improve flood protection while minimizing environmental impacts and maximizing public benefit.

The Final Scope should require a continuous line-of-protection plan and a segment-by-segment design-basis table for FiDi FORGE and each adjoining project. For every segment and tie-in, the report should disclose the vertical datum, design event, planning year, sea-level-rise assumption, passive and structural protection elevations, freeboard, deployable elements, closure points, residual risk, and adaptation provision. The EIS should test mismatched design standards, incomplete or delayed adjoining projects, inland and sewer pathways, temporary construction conditions, gate or pump failure, power loss, and exceedance events; map every route by which water could enter behind completed protection; and identify the entity responsible at each interface. The report should also state how FiDi FORGE shares data, assumptions, dependencies, and residual-risk responsibilities with HATS without treating the two studies as the same project.

The EIS should also evaluate how the various Lower Manhattan coastal resilience projects function together as an integrated flood protection system. In particular, it should assess whether differences in design flood elevations (DFE), alignments, or project sequencing could allow floodwater to bypass higher levels of protection by entering protected areas from adjacent or inland segments. The EIS should explain how the individual projects are designed to work together to prevent flooding from behind completed flood protection systems and identify any measures needed to avoid unintended vulnerabilities at the interfaces between projects.

Providing a transparent explanation of these design standards will help the public understand how the individual projects function together as components of a coordinated Lower Manhattan coastal resilience system.

2. Develop Integrated Resilience Strategies

The Draft Scope proposes evaluating five thematic approaches and advances the Structural on Land and Structural in Water approaches for detailed study while screening out the standalone Engineering with Nature approach.

The City Club appreciates the rationale for comparing different approaches during plan formulation. However, the alternatives as currently framed do not fully reflect how successful climate resilience projects are designed and implemented.

Contemporary waterfront resilience relies on layered systems that integrate structural protection, nature-based features, interior drainage, green infrastructure, transportation improvements, and high-quality public space. These strategies are complementary rather than competing. Treating Engineering with Nature as a separate alternative, rather than integrating nature-based solutions into the structural alternatives, risks overlooking opportunities to improve ecological function, reduce environmental impacts, and enhance the public realm.

The Final Scope of Work should evaluate whether integrated resilience strategies combining structural and nature-based approaches could better achieve the project's stated objectives while reducing environmental impacts, construction costs, implementation timelines, or other tradeoffs. In particular, the EIS should explain how Engineering with Nature measures will be incorporated into the structural alternatives; evaluate opportunities to reduce unnecessary encroachment into the East River while maintaining flood protection objectives; enhancing rainfall absorption, and storage, maximize publicly accessible waterfront and open space; and identify opportunities for habitat restoration, biodiversity, and ecological enhancement consistent with the goals of the FDSCRMP.

The planning horizon should extend beyond the currently proposed 50-year timeframe. Major public infrastructure investments made today should be expected to serve the city for a century or more. Accordingly, the EIS and project design should evaluate conditions at 100- and 150-year horizons to ensure that today's investments remain resilient, adaptable, and cost-effective under accelerating sea level rise and changing climate conditions.

For every measure and alternative, the Integrated Interim Report should publish the screening criteria, definitions, underlying data, ratings or scores, thresholds, weights, cost basis, uncertainty, and reason for advancement or elimination. It should identify the nonstructural, Engineering with Nature, drainage, transportation, and public-realm components included in each structural alternative and test whether reasonable changes in assumptions would change the final array or Tentatively Selected Plan. The report should distinguish the formal 50-year economic period from the longer service life of major structures, test performance at least through 2100 and over each component's expected life, and identify the cost, feasibility, lead time, and trigger for future adaptation. Designs that foreclose later options or transfer risk should be identified explicitly.

3. Measure Project Performance, Not Simply Environmental Impacts

The Draft Scope appropriately emphasizes identifying environmental impacts and mitigation measures across a broad range of resource categories. While this analysis is fundamental to NEPA review, FiDi FORGE is intended to accomplish far more than avoiding adverse impacts.

The environmental review should also evaluate how effectively each alternative achieves the project's stated objectives and the broader goals established in the Financial District and Seaport Climate Resilience Master Plan. Including measurable performance criteria would provide a more transparent basis for comparing alternatives and understanding the tradeoffs among them.

The EIS should also clearly identify the design standards, climate assumptions, and sea level rise scenarios used to evaluate project performance and explain how the proposed system can be adapted over time as climate science and flood risks evolve.

4. Strengthen the Transportation Analysis

The Draft Scope identifies maintaining transportation connectivity as one of the project's principal objectives and includes transportation among the technical analyses proposed for the EIS.

The Final Scope should require an operating-performance analysis for ferries, subways, buses, roads, pedestrians, bicycles, freight, emergency vehicles, and maritime services. The analysis should disclose current and future service, passenger and freight volumes, berth and terminal capacity, accessible routes, transfer patterns, and network dependencies. Alternatives should be compared using a bounded set of measures: passenger throughput, berth availability, accessible transfer time, street and greenway continuity, service-interruption duration, emergency and evacuation capacity, and time to restore operation. Hydrodynamic and navigation analysis should quantify changes in currents, maneuvering conditions, and access to maritime facilities during construction and operation.

Included in the analysis should be studies of how proposed changes to the shoreline will impact the currents of the East River and how changes in currents will impact maritime navigation.

The analysis should include options to increase connectivity with the existing street grid to enhance pedestrian access and visual and physical continuity, taking into account the NYC landmarked Street Plan of New Amsterdam and Colonial New York.

5. Strengthen the Analysis of Stormwater Management, Interior Retention and Drainage, and Emergency Response

The Draft Scope appropriately includes Water Quality and Stormwater Management as a technical resource category. However, the proposed methodology focuses primarily on potential impacts to existing infrastructure rather than evaluating how each alternative improves stormwater management and interior drainage capacity.

The Final Scope should require a defined compound-flooding test matrix pairing rainfall, tide, coastal surge, sea-level rise, and groundwater conditions, with the timing relationship among those hazards stated explicitly. The EIS should state whether collection, sewer conveyance, storage, gates, pumping, outfalls, and operating controls are unified, coordinated but separate, or independent by project area. The Integrated Interim Report should disclose model boundaries, calibration and validation, rainfall distributions, wastewater inputs, boundary conditions, assumptions about adjacent projects and interceptor gates, and uncertainty. It should test blocked outfalls, gate nondeployment, power loss, pump outage, and conveyance failure and report flood depth, extent, duration, sewer surcharge, combined-sewer-overflow volume, and recovery time. Pump analysis should identify capacity, redundancy, backup power, discharge constraints, maintenance access, and operating responsibility.

Similarly, the Draft Scope references emergency access as one of the project's objectives but provides relatively little discussion of how the alternatives will support emergency response and evacuation. The EIS should evaluate how each alternative affects emergency vehicle access, maritime evacuation, ferry operations during emergencies, and the resilience of critical transportation infrastructure.

6. Establish a Framework for Long-Term Governance, Monitoring, Adaptive Management, and Financial Sustainability

The Final Scope should require an asset-responsibility matrix identifying the owner, operator, maintainer, emergency decision-maker, and funding source for each floodwall, gate, pump, conveyance element, outfall, ferry facility, public space, and project tie-in. The report should state activation thresholds, command and communications protocols, inspection and testing requirements, backup-power arrangements, replacement schedules, and the process for modifying interfaces as adjoining projects or climate conditions change. Lifecycle comparison should include capital cost, contingency, operations, energy, major renewal, adaptation, and the fiscal consequences of delayed or incomplete funding. Public monitoring should be limited to the performance measures used to justify the selected plan.

The EIS should evaluate each alternative using lifecycle financial analysis rather than initial construction cost alone. Capital costs, operating costs, maintenance obligations, long-term repair needs, anticipated funding sources, remaining funding gaps, and long-term financial responsibilities should all be compared as part of the alternatives analysis. Given the scale of the proposed investment, the analysis should also identify the long-term fiscal implications for the City and discuss how funding commitments to this project may affect the City's ability to address resilience needs in other vulnerable neighborhoods.

Finally, the Final Scope should establish a long-term monitoring framework with publicly available performance measures for flood protection, ecological conditions, infrastructure performance (including CSO discharges, public access, and public use) so that project effectiveness can be evaluated over time and management strategies refined as conditions change.

7. Maximize Public Benefits

Throughout the Draft Scope, the methodologies emphasize identifying adverse impacts and mitigation measures. The City Club encourages the Final Scope to give equal attention to evaluating the public benefits each alternative is intended to deliver.

The EIS should assess how each alternative expands publicly accessible waterfront, improves the quality and usability of public open space, strengthens ecological systems, restores habitat, supports community programming, preserves historic resources and their character-defining elements, preserves significant views, improves accessibility for people of all ages and abilities, and contributes to the long-term vitality of Lower Manhattan.

Finally, because construction is anticipated to extend over approximately a decade, the EIS should include a consolidated analysis of cumulative construction impacts on neighborhoods, businesses, schools, transportation systems, cultural institutions, public health, and waterfront access, together with clear mitigation measures that minimize disruption throughout the construction period.

The analysis should also evaluate construction sequencing and identify opportunities to phase work in ways that preserve neighborhood access, support local businesses, maintain maritime and emergency response capabilities, minimize disruption to existing public spaces and waterfront activities, and reduce cumulative impacts over the duration of construction.

Conclusion

The City Club appreciates the significant effort that has gone into developing the Draft Scope of Work and recognizes the importance of carefully evaluating strategies to address increasing coastal flood risks in Lower Manhattan. Because FiDi FORGE represents one of the largest and most consequential public infrastructure investments proposed for New York City, the Environmental Impact Statement should provide a transparent, comprehensive, and objective evaluation of the project's alternatives, impacts, costs, benefits, and long-term implications.

A robust EIS will enable decision-makers and the public to better understand the tradeoffs among alternatives and help ensure that any future investment is well-founded, environmentally responsible, and in the public interest.

Thank you for your consideration of these comments. Should you have any questions or need clarification, please contact us at cityclubny@gmail.com.

Sincerely,

City Club Waterfront Committee Co-Chairs

Tom Fox
Trustee

John Shapiro
Vice President

Outlook

FW: Waterfront Alliance Public Comments on FiDi FORGE

From Weppler, Peter M CIV USARMY CENAN (USA) <Peter.M.Weppler@usace.army.mil>
Date Thu 7/23/2026 12:45 PM
To fidiforge@edc.nyc <fidiforge@edc.nyc>; Peterson, Casey <casey.peterson@arcadis.com>

1 attachment (312 KB)
Waterfront Alliance FiDi Forge Public Comments.pdf;

Arcadis Warning: Exercise caution with email messages from external sources such as this message. Always verify the sender and avoid clicking on links or scanning QR codes unless certain of their authenticity.

From: Tyler Taba <ttaba@waterfrontalliance.org>
Sent: Thursday, July 23, 2026 12:40 PM
To: CENAN-FiDiFORGE-203-Study <CENAN-FiDiFORGE-203-Study@usace.army.mil>; Alexis Taylor <ataylor@edc.nyc>; Weppler, Peter M CIV USARMY CENAN (USA) <Peter.M.Weppler@usace.army.mil>
Cc: Julie Raskin <jraskin@waterfrontalliance.org>; Furhana Husani <fhusani@waterfrontalliance.org>
Subject: [Non-DoD Source] Waterfront Alliance Public Comments on FiDi FORGE

Dear Alexis, Peter, and FiDi FORGE Project Team,

Please find the Waterfront Alliance's public comments on the FiDi FORGE Draft Integrated Interim Report attached to this email.

We greatly appreciate the opportunity to submit public comments and look forward to staying engaged over the course of the project. Please do not hesitate to reach out about anything in our comment letter.

All my best,
Tyler Taba

WATERFRONT ALLIANCE

Tyler Taba, WEDG
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11 Broadway, Suite 660
New York, NY 10004
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PUBLIC TESTIMONY OF WATERFRONT ALLIANCE

July 23, 2026

Comments on the Draft Integrated Interim Feasibility Report & Environmental Impact Statement (EIS) for the Financial District and Seaport Fortifying Our Resilient Growth and Economy (FiDi FORGE)

Submitted by: Tyler Taba, Director of Policy and Government Affairs, Waterfront Alliance

The Waterfront Alliance appreciates the opportunity to submit public comments on the Draft Integrated Interim Feasibility Report & Environmental Impact Statement (EIS) for the Financial District and Seaport Fortifying Our Resilient Growth and Economy (FiDi FORGE), or the Draft Integrated Interim Report.

Waterfront Alliance is committed to sustainability and to mitigating the effects of climate change across the region's hundreds of miles of waterfront. We convene the Rise to Resilience Coalition of 100+ groups advocating for policy related to climate resilience, we bring education focused on climate resilience to students in NYC Department of Education (DOE) schools through our Estuary Explorers program, and we run the national WEDG® (Waterfront Edge Design Guidelines) program for promoting innovation in climate design.

To begin, we strongly support NYCEDC's partnership with the U.S. Army Corps of Engineers (USACE) pursuant to Section 203 of the Water Resources Development Act (WRDA) of 1986, which could unlock federal funding covering up to 65% of eligible project design and construction costs.

Waterfront Alliance has proudly been a member of the Climate Coalition of Lower Manhattan (CCLM), organized by the New York City Economic Development Corporation (NYCEDC) and New York City Mayor's Office of Climate & Environmental Justice (MOCEJ), and have been engaged in the FiDi-Seaport Climate Resilience Plan over the last few years. Waterfront Alliance strongly support the efforts New York City has been working on to provide multi-layered flood protection across Lower Manhattan, including the WEDG®-verified East Side Coastal Resiliency Project (ESCR). We support the City's efforts to close the gap in the Lower Manhattan Coastal Resiliency (LMCR) portfolio, which is the 0.9-mile stretch of waterfront being evaluated in this Draft Integrated Interim Report.

Waterfront Alliance offers the following recommendations to support the Final Integrated Interim Report that will be prepared in compliance with the National Environmental Policy Act (NEPA), concurrent with a Section 203 feasibility study.

1. Clarify the Connection Between FiDi FORGE and the FiDi-Seaport Climate Resilience Plan

Overall, we seek clarity on how this Draft Integrated Interim Report advances, or departs from, the FiDi-Seaport Climate Resilience Plan the NYCEDC has been working on in partnership with the community over the last five years. The process has included engagement with residents, businesses, as well as public agencies like NYC Department of Parks and Recreation (NYC Parks), NYC Department of Transportation (DOT), and Metropolitan Transportation Agency (MTA). If there are any major changes being made to the FiDi-Seaport Climate Resilience Plan, which is difficult to assess from this Draft Integrated Interim Report, we request that NYCEDC communicate those changes clearly for transparency with the community who have been engaged over the last five years.

Waterfront Alliance supports the following aspects (in no order) of the FiDi-Seaport Climate Resilience Plan, and strongly recommends they remain in the FiDi FORGE project moving forward:

- Shoreline extension with a combination of floodwalls, flood gates, and other coastal flood protection infrastructure integrated within landscaped berms;
- Project tie-in to the adjacent Battery Coastal Resilience and Brooklyn Bridge-Montgomery Coastal Resilience (BMCR) projects;
- Natural and nature-based coastal resilience strategies to reinforce the flood protection and protect habitat;
- Upgrades to maritime uses and pier infrastructure along the waterfront, including the Staten Island Ferry Terminal, Governor's Island Ferry Terminal, NYC Ferry Terminal at Pier 11, Manhattan Waterfront Greenway, Battery Maritime Building, South Street Seaport Museum; and
- Inland stormwater management to manage impacts from extreme rainfall events

Additionally, in the Final Integrated Interim Report, we recommend detailing how the FiDi FORGE project is integrated with ongoing and surrounding resilience projects, including the Seaport Coastal Resilience Project, Battery Coastal Resilience Project, Battery Park City Resiliency Projects, Brooklyn Bridge-Montgomery Coastal Resilience (BMCR), and the USACE's larger New York-New Jersey Harbor and Tributaries Study (HATS).

2. Consider the Strengths in Each Proposed Alternative, Especially Engineering with Nature

The Draft Integrated Interim Report assesses five design features: No Action, Non-Structural, Structural on Land, Structural in Water, and Engineering with Nature solutions. From these initial approaches, only the no action, structural on land, and structural in water solutions were advanced to the final array of alternatives.

While we understand that Alternative 4 (Medium Shoreline Extension) most closely resembles the FiDi-Seaport Climate Resilience Plan, it is worth advancing components of an Engineering with Nature approach. Figure 4 in the Draft Integrated Interim Report (see below) shows the proposed Engineering with Nature solution scores high in four categories, including property protected and passive protection. We recommend advancing components of an Engineering with Nature solution into a future EIS. We understand the constraints that an ecotone levee would pose, including the challenges presented to existing and future ferry terminals and maritime operations. While this proposed Engineering with Nature alternative is not being advanced as a standalone, other natural and nature-based solutions should be studied in the EIS and considered as primary and reinforced flood protection options where feasible. Rather than evaluating nature-based against structural solutions, Waterfront Alliance recommends NYCEDC integrate them into the proposed structural designs. Co-designing structural and nature-based solutions is a design principle that Waterfront Alliance advocates for across the city to maximize flood protection and ecological benefit together.

Evaluation of alternatives against project objective metrics

Approach	Property Protected	Transportation Protected	Maritime Uses Preserved	Universal Accessibility	Passive Protection	Initial Investment
1: No Action						
2: Non-Structural	Low	Low	Low	Low	Low	Low
3: Structural On Land	High	High	High	Low	Medium	High
4: Structural In Water	High	High	High	High	Medium	Medium
5: Engineering with Nature	High	High	Low	High	High	Low

Figure 4. Ranking of the Initial Thematic Approaches Compared to USACE Principles and Guidelines

The Draft Integrated Interim Report mentions that Engineering with Nature measures may be "included as appropriate with the structural alternatives," which we strongly support. As NYCEDC is now working in partnership with USACE, we strongly recommend tapping into the USACE's Engineering with Nature team to identify creative ways to maximize nature-based solutions.

3. Utilize WEDG Standards for Resilience, Ecology, and Public Waterfront Access Goals

To better support the complementary project goals of flood resilience, ecology, and public waterfront access, we recommend the FiDi FORGE project pursue WEDG verification. WEDG is a voluntary rating system encouraging waterfront projects to provide a combination of resilience, ecological, and accessibility benefits to the community. Waterfront Alliance recommends that protection measures and projects that create new land through fill adhere to the WEDG technical standards. Designing projects to the WEDG standard will support many of the concerns that community members, environmental groups, and others have raised at the public scoping sessions.

WEDG categories include:

- Site Assessment & Planning: Use sound assessment and community input to establish processes that support design, construction, management, and adaptation.

- Climate and Hazard Resilience: Use responsible development strategies for project siting and resilience that account for climate change and flood risks.
- Community Access & Connections: Make waterfronts more accessible, inspiring, and welcoming to all by engaging diverse community stakeholders in the design of waterfront projects.
- Edge Composition: Design a waterfront with an edge that is appropriate to the site conditions, sensitive to local ecology, and improves resilience.
- Natural Resources and Sustainability: Conserve, manage, and restore biodiversity and ecosystem function.
- Innovation: Significantly surpass guidelines or develop new ways to significantly increase resilience, ecology, or public access.

WEDG is designed to shape waterfronts that include features that will be welcomed by the community, while also providing resilient infrastructure and enhancing the ecological value of the site. WEDG was awarded the American Planning Association's Gold National Planning Achievement Award for a Best Practice in 2019. As mentioned, neighboring projects like ESCR and South Battery Park City Resiliency are both designed to adhere to WEDG standards. The standards are recognized by multiple community boards, including Manhattan CB1, as a trustworthy technical standard. By designing projects to align with WEDG performance criteria and design strategies, the NYCEDC can create features with co-benefits to the community beyond resilience. For more information on the technical specifications within WEDG, consult the WEDG Manual at: https://wedg.waterfrontalliance.org/resources/#explore-the-standard.

4. Integrate Resilience and Transportation Strategies

We understand that the flood protection components in the FiDi-Seaport Climate Resilience Plan had been designed to 30% but are unclear about the level of design for rest of the project. Designs for critical components of the project should be integrated into the Final Integrated Interim Report. For example, designs along the southernmost project area where FiDi FORGE ties-in to the Battery Coastal Resilience project, as well as the proposed relocation and replacement of critical transportation infrastructure like the Staten Island and Governors Island Ferry Terminals.

Waterfront Alliance recommends that the Final Integrated Interim Report clearly identify the project's design elevation, planning horizon, and adaptive management strategy. Given the uncertainty associated with sea level rise projections and extreme weather events, infrastructure should be designed to accommodate future modifications and increases in elevation where necessary, without requiring wholesale reconstruction.

Consistent with our advocacy for waterfront greenways across New York City, Waterfront Alliance recommends that any expansion of the East River Esplanade integrate green infrastructure for stormwater management and tree plantings for shade during extreme heat days. Similarly, landscape areas of the waterfront park should maximize green landscaping options. We would not support a pedestrian esplanade that is largely designed with impervious surface and limited shading options. Waterfront Alliance recommends that the project maintain safe and accessible waterfront connections wherever feasible and to clearly describe how public access, ferry services, bicycle routes, and pedestrian circulation will operate before, during, and after storm events.

Additionally, Waterfront Alliance recommends the Final Integrated Interim Report include a study of how the Blue Highway program, which is housed within NYCEDC, could be integrated into the FiDi FORGE project. With the reconfiguration and adaptations along Pier 6, 11, and 16, there is a unique opportunity to pursue a freight dock and transloading facility along the existing piers. Waterfront Alliance strongly supports the City's efforts to reduce truck congestion by moving more goods through the harbor via maritime freight. Moreover, the Final Integrated Interim Report should evaluate how maritime assets within the project area can support emergency response, evacuation, recovery operations, and continuity of transportation services following extreme weather events.

5. Improve Community Engagement and Transparency with the Public

As Section 203 of WRDA 1986 allows non-federal entities, such as NYCEDC, to conduct their own feasibility studies with technical guidance and review from USACE, it should, too, allow for a more flexible community engagement process than a traditional USACE process. Waterfront Alliance recommends that NYCEDC leverage the full suite of New York City's community engagement strategies, including building on successful prior engagement strategies like the "Resilience+" workshops hosted across the Financial District and Seaport neighborhoods.

The opportunity for feedback for the Draft Integrated Interim Report did not provide sufficient information about the project alternatives, which hindered the ability to offer substantive feedback. At the in-person and virtual public scoping sessions, NYCEDC and USACE were not answering questions about the project from members of the public, which fails all levels of meaningful and transparent community engagement. We understand that additional feedback opportunities are coming up after the Draft Integrated Interim Report is published, but we sincerely hope for the opportunity to stay engaged and in communication through more informal channels.

6. Develop an Estimated Project Timeline and Cost

In the Final Integrated Interim Report, we strongly recommend detailed cost estimates and project construction timelines. From the CCLM workshops, we recall a cost ranging from $5.5 billion to $9 billion, depending on when construction is expected to start.

Waterfront Alliance recommends that the Final Integrated Interim Report include preliminary construction phasing assumptions and strategies to minimize disruptions to residents, businesses, recreational users, maritime operators, and critical transportation services. The Final Integrated Interim Report should also identify long-term operations and maintenance responsibilities, estimated lifecycle costs, funding mechanisms, and interagency coordination protocols to ensure continued performance of flood protection infrastructure over time.

As stated earlier, Waterfront Alliance strongly supports the City's efforts to complete the gap in coastal resilience along the 0.9-mile stretch of waterfront in the FiDi FORGE project area. Similarly, we strongly recommend the City prioritize neighborhoods and communities outside of Lower Manhattan, which has received the largest investment in coastal resilience. We strongly encourage the City to use lessons learned from this project, as well as the rest of the LMCR portfolio, to scale resilience projects across the shoreline, especially in disadvantaged and environmental justice communities. If the Section 203 partnership with USACE proves to be successful in Lower Manhattan, we recommend using it to advance community-led waterfront projects across the five boroughs.

Conclusion

Waterfront Alliance appreciates the opportunity to submit public testimony for the FiDi FORGE Draft Integrated Interim Report. As a leading advocate for climate resilience and public waterfront access across the New York and New Jersey Harbor region, the future of this project is incredibly important in shaping how the City advances its commitments to resilience and access in the Comprehensive Waterfront Plan, PlaNYC, and several other citywide plans. We look forward to staying engaged and to hearing back from the project team.

NEW YORK CITY ECONOMIC DEVELOPMENT CORPORATION

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FiDi FORGE, also known as FiDi-Seaport Climate Resilience Plan)

RE: Integrated Interim Feasibility Report and Environmental Impact Statement (EIS)

PUBLIC SCOPING MEETING

----------X

National Museum of the American Indian

1 Bowling Green, New York, NY 1000

June 23rd, 2026

6:32 p.m.

B E F O R E:

AMANDA REGAN,

THE MODERATOR

A P P E A R A N C E S:

NAME	AFFILIATION	PAGE
Sandy Collins	AKRF	3
Amanda Regan	Moderator	4
Max Deutsch	Deputy Chief of Staff to Councilmember Christopher Marte	5
Michael Kramer	Battery to Bridges Coalition of 501(c)(3)	8
Paul Gallay	Resilient Coastal Communities Project at Columbia University	11
Catherine Hughes	Resident	13
Luke Gayford	Resident	16
Tom Simpson	Resident	18
Peter Weppler	US Army Corps of Engineers New York District	21
Ryan Stoddard	Arcadis	

P R O C E E D I N G S

MS. COLLINS: The website will provide you the information and the sign up for that as well. Again, the public scoping period extends through July 14th, and we invite you to sign up for the FIDI FORGE mailing list to receive updates and stay informed on the progress of the project.

Next slide.

So, how can you provide public comments that can be part of the scoping, the formal scoping process?

Next slide.

So the comments provided tonight will be part of the formal record, just to remember that this is a scoping meeting, so we will not be responding to questions tonight. There are several ways that you can have your scoping comments become part of the public record.

You can provide them verbally tonight, where they'll be recorded by a stenographer. You can submit them electronically to the website or the email address that's

provided, as well as the QR code. And then finally, if you want to provide your comments on paper, there are paper forms that can be provided to you upon request tonight.

All comments that are submitted as part of the public scoping process will be summarized and responded to in a memorandum after the close of the comment period.

Next slide.

And I think I'm turning it over to Amanda to start the public scoping comment process.

MS. REGAN: Thanks, Sandy.

We'll go over some logistics now. The process we have in place is to ensure that everyone has the opportunity to speak.

Members of the public will be called to the microphone, beginning with attendees who indicated in their RSVP that they would like to leave a verbal public comment. I'll call speakers to the microphone by name.

If you did not indicate on your RSVP or at check-in that you want to leave a public comment, there will be time at the end for you to do so.

Your public comment will be limited to three minutes. If there's time at the end, attendees may be invited to leave additional comments. Additional comments will also be limited to three minutes.

In your public comment, we encourage you to state and spell your name, any organizational affiliation, and connection to the project area. Each public comment will be transcribed for the record.

In the meantime, I invite the commenters who indicated the intent to share a public comment to come sit closer to the microphone if you can.

Right now, the engineer of record, Ryan Stoddard, will take his place on the panel. Our first commenter will be Max Deutsch.

On our screen here, we're going to have a timer visible to you while you're speaking. When we are approaching 30 seconds, I will interrupt and let you know there's 30 seconds. And then when your time is up, I will also let you know your time is up, and we'll close the comments.

MR. DEUTSCH: Good evening,

everyone. My name is Max Deutsch. I'm the Deputy Chief of Staff to Councilmember Christopher Marte, who unfortunately can't be here tonight, but I'm here to read a testimony on behalf of the Councilmember.

We'd like to thank you all for letting us testify. This is a very important step in the process for the FIDI-Seaport Resiliency Project, and I'm happy to see the members of the public here and encourage everyone to continue to submit comments through mid-July when this phase of the process ends.

We're here to comment on the scoping of the environmental review required as part of the proposed Section 203 feasibility study. I am supportive of this effort to protect our waterfronts as part of a larger resiliency campaign we have undertaken across lower Manhattan.

Each section of our coastal resiliency efforts, from 14th Street on the east side to the top of Battery Park City, is only effective if every piece falls into place. So it is essential that the FIDI-Seaport Plan is realized.

Given my general support, I would like to use this opportunity to raise crucial concerns regarding the scoping of such an environmental review to ensure that this project is successful while mitigating impacts to the residents, students, and workers who inhabit this stretch of waterfront every day.

First, I want to recommend that the study area include all of Southbridge Towers as well as the Smith Houses just north of the Brooklyn Bridge. These two residential complexes are not fully included in the proposed study area, but are close enough to the project area to be severely impacted. As two major residential concentrations in the area, both with aging building stocks, it is essential that they be wholly considered in this environmental review.

Second, as this project will primarily impact areas along the FIDI-Seaport waterfronts, I would like to emphasize the importance of analyzing impacts to our waterfront access points and public open spaces.

A significant portion of publicly accessible open space downtown is located along our

waterfront, which will be essentially eliminated during construction of this plan. As temporary closure of these spaces is unavoidable, mitigation plans must be fully explored to provide as much alternative public space as possible during the construction.

I encourage the utilization of a staged approach to open space closures, which has been done in the cases like the adjacent BMCR, to preserve some open space at any given time. Within the same vein, I am strongly encouraging the protection of any and all mature trees in the area to the greatest extent possible.

Lastly, we know that some of the largest impacts from a project like this will be to our quality of life. Noise, vibration, and air quality must be thoroughly considered in this environmental review. Mitigations such as adequate monitoring, residential air filters, dust suppression measures, and trash pickup must be taken into consideration to best protect our residential populations from these impacts.

MS. REGAN: 30 seconds.

MR. DEUTSCH: I thank you for your

consideration and look forward to hearing the concerns and comments of our neighbors about this comment period. Thank you.

MS. REGAN: Thank you for your comment.

I'd like to call Michael Kramer up to the microphone, please.

MR. KRAMER: Good evening. My name is Michael Kramer. I'm president of the Battery to Bridges Coalition of 501(c)(3).

We appreciate the work of the Army Corps, New York City EDC, and the City of New York in advancing this study. At the same time, support for resilience does not mean automatic support for every design choice.

The purpose of this scoping process is to ask important questions early before assumptions become locked in. We ask that the EIS study protect existing public assets, expand real public benefits, and give the community enough information to understand what is being proposed. Our message is simple.

The Lower Manhattan needs flood protection, but it should also get a better

waterfront. We respectfully ask that the EIS include the following seven items: study and retain, and adapt the Pier 15 alternative. It's a heavily used public waterfront asset that was rebuilt relatively recently;

Explain the purpose and need for Pier 19 when Pier 15 can be retained. Who would own it? Who would operate it? And who would maintain it? Back of the napkin says you can save about $100 million if you can go without this new pier. Examine whether the proposed Pier 7 through 13 ferry terminals can serve blue highway maritime freight functions;

Define the promised Seaport Recreation Center or comparable public use facility. We support a resilient public facility near the former New Market building footprint that could serve recreation. But a public benefit must be more than a concept.

The EIS should identify the likely sites, size, uses, funding path, public-private decision-making process, and timetable. Study the Brooklyn Bridge shoreline as a public open space opportunity. The area under the Brooklyn Bridge

should not be treated as leftover space.

The EIS should study whether a resilient beach, cove, or Gansevoort Peninsula-type public access amenity can be created safely. The approach for pedestrians and human-powered transportation should be seamless between the end of the BMCR and the seaport in the vicinity of the Brooklyn Bridge. We vigorously oppose the construction of any wall that separates our communities;

Prepare a real maritime use plan. The waterfront should not only become a real flood wall with a decoration on top. It should remain a working, civic, historic, educational, recreational maritime waterfront.

MS. REGAN: 30 seconds.

MR. KRAMER: And provide clearer drawings, and phasing, and construction information. We ask that the community engagement be a real part of the decision-making process. And we offer these comments not in opposition to flood protection, but as conditions for public trust. We're not asking for a delay. We're asking for the EIS to test whether the proposed design is the most

publicly beneficial way to achieve urgent resilience. We continue --

MS. REGAN: Thank you. Your time is up.

MR. KRAMER: May I submit the rest of my report?

MS. REGAN: Thank you.

MR. KRAMER: Who do I give it to?

MS. REGAN: Email, so we have a QR code that you can actually provide that in writing. And that way it can be recorded for the record.

I'd like to call Paul Gallay.

MR. GALLAY: Thanks for this opportunity. I speak on behalf of the Resilient Coastal Communities Project at Columbia University, which is a partnership between our climate school and the New York City Environmental Justice Alliance. Our goals are to foster the sort of protection that this project is seeking to achieve, while at the same time also achieving commensurate goals having to do with habitat protection, community revitalization, and restorative justice.

And we urge you, and we'll of course also put in written comments by the 14th,

but we urge you to be mindful, of course, not only of the potential benefits of your different alternatives, the potential impacts, which of course you must under NEPA and 203, but also the idea that in a city that's facing financial constraints such as New York City.

Whatever is invested in this plan for protection and for amenity is not available to protect other areas of the 520 miles of coast that we are all counting on in maintaining quality of life, improving social cohesion, improving natural resource protection, and the like.

So while these different alternatives, we don't have the prices, numbers have been thrown around, but I'm not going to presume those numbers are accurate. Whatever is spent here is not available to be spent on areas that need protection as well.

And so the balancing of protection versus amenities is particularly important at this point. Protection is essential, amenities are ideal, but if amenities come at the expense of protection of other communities, that's a factor that must be considered.

So again, I will quit early so that others can speak. We look forward to continue to participate in this process. We've participated in a number of other processes related to the Harbor and Tributaries Plan, and we hope we can be part of your coalition seeking to achieve the best possible project. Thank you.

MS. REGAN: Thank you.

Catherine Hughes?

MS. HUGHES: Hello. Good evening. My name is Catherine McVeigh Hughes. I'm speaking here as an individual who's actually lived in this neighborhood for almost four decades.

On October 29, 2012, I was the chair of Manhattan Community Board 1 and saw firsthand the devastation of our neighborhood, and you only saw one of those pictures. Our neighborhood is still repairing and recuperating from that damage. For example, we got another notification that the underpass tunnel is being fixed.

Since then, roughly 14 years ago, I had been appointed as co-chair for New York Rising. I was also -- since then, I've attended

hundreds of resiliency meetings and also helped to rebuild the neighborhood. Since the US has the regional storm surge protection system is not moving forward, this FIDI Forge is really the only thing that will protect the FIDI project, the FIDI neighborhood.

It is the last compartment of the Big U, the Lower Manhattan Coastal Resiliency Plan. At this time, there's no New York City funding to move this project forward, so I appreciate the opportunity of partnering of the US Army Corps with New York City. As you know, Manhattan Community Board 1 has roughly 78,000 residents, of which a majority are in the FIDI area.

It is also where our neighborhood started. New York City started 400 years ago. We are celebrating the 250th. Right around the corner was where George Washington said goodbye to the troops.

The reason why this is so important is we didn't talk about the increasing extreme weather events. We didn't talk about the recent FEMA cuts. We didn't talk about whether there will be a FEMA to respond for the next storm.

We haven't talked about insurance.

Insurance: if you buy insurance for your rental or your property, you can only get it as a one-year term. This project could protect the city for much longer than one year. We also haven't talked today about the difficulty of the reinsurance market.

So, to wrap it up, I totally agree with you that options 1 and 2, no action, and the no structural, those two are not an option.

And when you move forward, please consider removing the FDR ramp south of the Brooklyn Bridge so that the east side of the Hudson River can be as nice as the west side. And that funding is really needed to move this project forward, and it cannot happen soon enough.

Thank you very much for your time tonight. And I will be submitting written comments. Thank you.

MS. REGAN: Thank you.

Gildon Smith.

We have Luke Gayford.

MR. GAYFORD: Good evening. Luke Gayford. G-a-y-f-o-r-d. I'm a worldwide traveler,

as you can tell by the accent. I've seen plenty of harbors around the world, et cetera, et cetera. And I've lived in New York City for 25 years. And I've seen all the events that have circumstanced the city in those 25 years. And there has been much and many tragedies.

My experience with coastal fortifications and stuff is much varied, all the way from the tsunamis in Fukushima to even more localized experiences of floodplain protections for places like Lismore, New South Wales, Australia.

In these attempts at building any of these coastal fortifications to minimize the problem, no matter how much you consider, what we think or we measure in our lifetimes does not compete against what the geological facts and the rising of sea levels are.

Just as of June 1st and 2nd of this month, anyone who was down at the waterfront would have seen how high the levels were. We're having predictions of 5 inches over the norm over the next couple of months. And that 5 inches is on top of the 5 inches that has been predicted from measurements last year, which was a 5-inch

prediction.

So that's now 10 inches. Now, when these proposals were put in, in April 2021, on New York Harbor, was actually the first notable increase in tidal and sea level rising. There's no argument about sea levels rising. It's a fact. You don't need to prove the science or anything behind it.

Now, with the failure of the resilience of these things, number one, this is actually centric for Manhattan. There's no consideration for Brooklyn, Staten Island, or other areas that have been affected by coastal flooding. So there's that aspect as well. And as I've said, no matter what, in my experience personally, like, the ocean's pretty serious.

Do you really think you're going to stop it from coming in? And as from observations with the construction that's going on at South Avenue, I believe we're seriously going for the plan 3 as the structures are being built under the FDR at this time for the fortifications of the seawall.

So, I'll sum that up with that.

But, you know, good luck. Thank you.

MS. REGAN: Thank you.

So that was the list of names we had signed up in advance for public comments. I wanted to see if anybody else who didn't previously state they wanted to provide a comment, please come up to the microphone now, and you would receive three minutes to do so. And please make sure you say and spell your name for the record, please.

MR. SIMPSON: Good evening. My name is Tom Simpson. I'm a local resident. I live at 21 West Street. I've lived here for 25 years. I'm out here every night, every day. I use this waterfront very heavily.

I know this reach, especially down along the East River. I'm especially concerned about the stretch from the Staten Island Ferry up to Pier 11, which I think is really in poor shape, and it really does a disservice to the waterfront as it is.

But I want to talk about the alternatives that I'm seeing here and just give you my take on these alternatives, the three alternatives.

First, let me start with alternative three. It looks like just a wall walling off of the views and the waterfront. If I'm reading it correctly, it's just a wall.

In other words, we'll be looking at a wall which will be blocking off the view. This is going completely counter to what I think is right. If you're going to consider alternative three, then consider doing it the way that they're doing it from the bridge north, from the Brooklyn Bridge north, which is flip-up walls.

Flip-up walls, they preserve the view. They don't provide any kind of park amenity, but it's better than just it looks, like it's just a straight wall up. I hope I'm not misreading it. As far as I'm concerned, alternative three, totally unacceptable. I really hope you don't go down that path. I can see it's probably the least cost. I'll come right to the point. I favor alternative four. Alternative four provides a little bit of a park amenity.

Alternative four kind of reminds me a little bit more. We're getting more towards the Wagner Park or Rockefeller Park. We're

providing a neighborhood amenity, but also a tourist amenity. You've got to keep in mind this region, this is used heavily as a tourist quarter. We've got tourist attractions, the Battery Park. Pier 11 is now being used very heavily for tourism.

Of course, the Staten Island Ferry. This whole area is very heavily used. If you provide a little bit of a park amenity, that'll be great.

MS. REGAN: 30 seconds. 30 seconds.

MR. SIMPSON: 4A provides a little bit of a -- 4A reminds me of what they've done along the Esplanade let's say out on the west side. You've got a little bit of parkland that's off limits to walking in, and then you've got an Esplanade that everybody uses. A little bit of park land, it's nice. Provides a little bit of shade. Think about shade if you're going to do it that way. It's off limits.

MS. REGAN: Your time is up. Thank you for your comment.

MR. SIMPSON: So anyway, alternative four. Thank you.

MS. REGAN: Thank you. Would anyone else like to provide a public comment for the record?

(No response.)

MS. REGAN: We're going to be here for a little while. I encourage you to take a look at the boards in the back if you want some clarity on some of the discussions. You'll see some of our staff walking around with name tags.

I just want to thank you for attending this evening's scoping meeting. The transcription from tonight will be incorporated into the record. Written comments can still be provided through the QR code that links you to the public record email in which they'll be recorded by the Army Corps of Engineers.

And I thank you for coming this evening out in this weather and we will have another meeting on Thursday evening virtually so feel free to attend that one as well if you are looking forward to it. Thanks.

MR. WEPPLER: I just want to add one more important point, I think.

If you noticed in the title of the

report it says interim. So it's not the final solution for the area and I think it's really important that while we're citing NEPA and Section 203 as the ability for New York City EDC to prepare the report, this is the same study authority that New York New Jersey HATS or Harbor Intravenous Study is utilizing. So this area was highlighted in HATS.

We had a little different alternative that was discussed in the 22 report within Alternative 3B but this is looking at providing a solution for the same portion of the area within the HATS study area. So I just wanted to highlight that while they're working on the 203, it is an interim response to within the overall HATS study. So I think that's really important that they're not just hap hazarding.

There is a method to the madness to connect the parts. So areas that may not be part of the study area now are still open for evaluation later in the future. I just wanted to highlight that. Thank you.

MS. REGAN: Thanks, Peter.

Thank you, everyone. Have a good

evening.

(At 6:53 p.m., the proceedings were concluded.)

STATE OF NEW YORK)
SS.
COUNTY OF NEW YORK)

I, MARC RUSSO, a Shorthand (Stenotype) Reporter and Notary Public within and for the State of New York, do hereby certify that the foregoing pages 1 through 25, taken at the time and place aforesaid, is a true and correct transcription of my shorthand notes.

IN WITNESS WHEREOF, I have hereunto set my name this 6TH day of July, 2026.



MARC RUSSO

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NEW YORK CITY ECONOMIC URBAN DEVELOPMENT CORPORATION

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FiDi FORGE, also known as FiDi-Seaport Climate Resilience Plan

RE: Integrated Interim Feasibility Report and Environmental Impact Statement (EIS)

PUBLIC SCOPING MEETING

----------X

June 25, 2026

6:33 p.m.

B E F O R E:

AMANDA REGAN,

THE MODERATOR

A P P E A R A N C E S:

NAME	AFFILIATION	PAGE
Amanda Regan	Moderator	3
Sam Jackson	Metro Flood Defense	4
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P R O C E E D I N G S

MS. REGAN: Thanks, Sandy.

And so right now this process is to ensure that everyone has the opportunity to speak. We'll begin with speakers who indicated in their RSVP that they would like to leave a verbal comment.

In order to provide a verbal comment, please use the "raise hand" button to get added to the list to speak.

If you're dialed in, please press *9 to raise your hand. The moderator will lower the hand when you've been added to the list.

The name of the speaker will be called when it's their turn to speak. The speaker will be promoted to a panelist or click, "join as a panelist" on the pop-up. The speaker will be unmuted and be able to provide their public comment.

If you're dialed in, please press *6 to unmute. Your public comment will be limited to three minutes. If there's time at the end, attendees may be invited to leave additional comments. Additional comments will still be

limited to three minutes. The timer is located at the top right corner of the Zoom frame during the public comment process. At the 30-second mark I will interrupt and let you know that you have 30 seconds left.

In your public comment, we encourage you to state and spell your name, any organizational affiliation and connection to the project area. Each public comment will be transcribed for the record.

Our first commenter will be Sam.

MR. JACKSON: Hello, everyone and thank you all for your presentations. I will make -- make this brief. I plan to submit written comments as well.

My name is Sam Jackson, I'm the copresident of Metro Flood Defense. I have met with at least Alexis, hello. I met with Alexis, and you know, have -- have had the chance to hear a good amount about this project, and just want to say that I'm absolutely in support of finishing the last piece of the puzzle to -- to protect Lower Manhattan.

And I will just ask -- and I know,

Alexis, I have spoken to you about this before, but I would just ask that all parties involved would lend as much support to the Bureau of Costal Resilience and also to the Army Corps in supporting projects and advancing projects in the coming decades that will protect the rest of the HATS study area, because we all need protections and this project is absolutely important and I hope that all parties involved will do everything they can to support other projects, which I think will garner a lot more support for this project as well from throughout the city, and we are a region and we've gotta stick together.

And thanks, everyone, and thank you for the time.

MS. REGAN: Thank you for your comments.

Our next commenter is going to be Tom Fox.

MR. FOX: Hi. Can you hear me? Hello?

MS. REGAN: You're good.

MR. FOX: Okay. Thank you.

My name is Tom Fox and I'm on the

waterfront committee of the City Club of New York. And you know, I agree with Sam, that this is a critical part of finishing the puzzle, if you will, of protecting this vital part of the city.

My observations from a mariner's perspective and from a public space perspective, as I have no engineering background. But the concern that the things he was pretty much -- like totally independent from the community that it's serving. I don't see any kind of, like, connectivity between this particular project and what is the oldest part of New York City. So if you're restoring waterfront, waterborne transportation which is wonderful, because this a traditional area for waterborne transportation. One should consider connectivity to the street grids which fed this waterborne transportation for the last 3, 400 years.

Secondarily, you're increasing the length of shoreline -- excuse me. I need a little drink of water -- we hope that hydrological studies are being done to understand the effect on navigation. This is already a very fast-moving part of the East River, and you're going to be

touting it as a waterborne transportation area. So any changes in current intensity, interactions, those types of things, especially in the larger facilities like the proposed Staten Island Ferry Terminal, the renewed ferry terminal should be considered.

I think you said -- somebody said a piece of the -- last piece of the puzzle. And although in the beginning I heard somebody say very carefully that these all have independent utilities, so nobody can argue segmentation.

The Battery Park City section of this project has just got approval to install a 60-million-gallon-a-day pump to evacuate all of the water from Battery Park City and the adjacent World Trade Center area into the Hudson River Park estuary. It appears as this is going to have to have pumps, if you will, to evacuate water from the other half of Lower Manhattan. And I'm wondering if more thought can't be put to retaining more of that water under new structures or treating that water prior to its being distributed into the waterway.

And you know, the effect on the

species, it's a one-year study, much of the species that run through here are migratory, so I assume you're working on historic studies and you're going to do like one year of monitoring perhaps in your EIS, and I think that's a good idea. Thank you.

MS. REGAN: Thank you for your comment.

Our next commenter is Tion Wienberg.

(No response.)

Our next commenter is April Hawthorne.

(No response.)

MS. REGAN: All right. So if anyone else on the call would like to make a comment, please raise your hand.

(No response.)

MS. REGAN: Hope, I see your hand, so I'll have you comment first.

Are you having difficulties accessing the Zoom to comment?

MS. COHEN: Okay. Apparently, I've been promoted.

I -- this is Hope Cohen from the Battery Conservancy. I was trying -- I'm interested to understand better how this stage of

NEPA and Army Corps studies relates to additional environmental review requirements by the State and the City. It was mentioned briefly in the overview.

But I'd like to understand that better because of the schedule implications. Are these serial? Or is there anything that you're doing in parallel?

MS. REGAN: Is that the rest of your comment or?

MS. COHEN: Yes. I have no substantive comment. I have that question that I want in the record because I want the answer in the record. The relation between the NEPA study and any other levels of government.

MS. REGAN: Thank you so much. I appreciate the comment.

Our next commenter is Mary Habstritt, if you're still on. Let us know if you're having difficulties.

MS. HABSTRITT: I see I was muted.

Can you hear me now?

MS. REGAN: Yes. Thank you.

MS. HABSTRITT: Okay. My name is Mary

Habstritt.

As a historic preservationist, as a maritime historian and as the museum director of a historic ship, I have many concerns about this plan and whether the impacts of it will be adequately assessed, but tonight I speak as a Staten Islander.

I rely on the Staten Island Ferry. This ferry is a critical connection to Manhattan for thousands and thousands of Staten Islanders for work, for shopping, for entertainment and education. As a Staten Islander, I would have no idea that there was a plan afoot to replace the Whitehall Terminal. There has been no outreach that I know of to Staten Island.

While many meetings have already been held with stakeholders in Lower Manhattan, the potential impact of this project upon Staten Islanders must be assessed with input solicited from Staten Islanders. Saying that ferry service will be maintained is not enough. The new terminal must enhance ferry service to and from the forgotten borough and make sure it continues to be robust into the future.

As proposed, the Whitehall Terminal is

to be enlarged to take in additional operations, including ferries to the increasingly-popular Governors Island, and possibly security screening for Liberty and Ellis Islands, both major tourist destinations.

How will these responsibilities affect Staten Island Ferry operations? Although enlarged, the proposed new Whitehall Terminal will be pressed on all sides by new infrastructure. Will it be big enough? There appears to be no expansion space for the future.

Right now, thousands of new housing units are being built or proposed on just the north shore. Immediately adjacent to the ferry terminal in St. George, EDC is proposing 2,500 residential units. That's just one of several large developments within a few blocks and there's more housing going up in Stapleton.

Has the proposed new Whitehall Terminal taken the increasing population of Staten Island into account? Will more or bigger ferries be needed? Will they need to run more often? And can these needs be accommodated by the new terminal? Thank you.

MS. REGAN: Thank you for your comment.

Our next commenter is Jackie Wu.

MS. WU: Sorry. That was an accidental hand raise. Thank you very much.

MS. REGAN: Thank you.

Is anyone else interested in providing a public comment at this time?

(No response.)

MS. REGAN: All right. Well, thank you for attending this hearing.

We have one more? April. Okay. Excellent. Our next commenter will be April Hawthorne.

(No response.)

MS. REGAN: All right. I think that was the last of the comments for the evening. Thank you for attending this evening's scoping meeting.

The transcription from tonight will be incorporated into the record. Written comments can be still provided through the QR code. Thank you so much.

(Whereupon, at 6:47 p.m., the proceedings were concluded.)

C E R T I F I C A T E

STATE OF NEW YORK)
: SS.:
COUNTY OF NEW YORK)

I, MADELINE TAVANI, a Notary Public for and within the State of New York, do hereby certify:

That the above is a correct transcription of my stenographic notes.

I further certify that I am not related to any of the parties to this action by blood or by marriage and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 7th day of July, 2026.



MADELINE TAVANI

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NEW YORK CITY ECONOMIC DEVELOPMENT CORPORATION

----------X

FiDi FORGE, also known as FiDi-Seaport Climate Resilience Plan

RE: Integrated Interim Feasibility Report and Environmental Impact Statement (EIS)

VIRTUAL PUBLIC SCOPING MEETING

----------X

DATE: Thursday, July 16, 2026

TIME: 3:29 p.m.

B E F O R E:

AMANDA REGAN,

THE MODERATOR

A P P E A R A N C E S :

NAME	AFFILIATION	PAGE
Amanda Regan	Moderator	3
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FiDi - Public Scoping Meeting

P R O C E E D I N G S

MS. REGAN: Thank you, Sandy.

This process is to ensure that everyone has the opportunity to speak. We will begin with speakers who indicate in the RSVP that they would like to leave a verbal comment.

To provide a verbal comment, press the "raise hand" button to get added to the list to speak. On dialing, press *9 to raise your hand. I will lower your hand when you've been added to the list.

The name of the speaker will be called when it's their turn to speak. The speaker will be promoted to a panelist, and we'll click "join as a panelist" on the pop-up.

The speaker will be unmuted and provide their public comment. On dialing, press *6 to unmute. Your public comment will be limited to three minutes; that time will be displayed in the upper right corner.

If there is time at the end, attendees may be invited to leave additional comments. Additional comments will still be limited to three minutes.

FiDi - Public Scoping Meeting

In your public comment, we encourage you to state and spell your name, any organizational affiliation, and connection to the project area. Each public comment will be transcribed.

The first commenter we have on our list would be Martine Johannessen with Manhattan CB1. You can speak now, Martine.

(No response.)

MS. REGAN: If you're having difficulties, please let us know in the chat.

Okay, in the meantime, we'll go to our next person on our list. We have Michelle Luebke.

MS. LUEBKE: Hi.

(Connectivity disruption.)

MS. REGAN: We hear you. Actually, we can't hear you now.

(Connectivity disruption.)

MS. LUEBKE: Stop. The Stormwater Infrastructure Matters Coalition, we are a group of over 70 organizations devoted to clean water advocacy in the New York City area.

One of the first questions we have is why the nature-based solution or the nature-based engineering solutions, why was the removal of the

ferry terminal included in that option, and therefore, it was removed?

We also want to uplift a group of us. Some of us representing many other organizations have reached out seeking clarity on some of the fundamental decisions and exclusions that had already been made without possibility for public comment, and we have yet to hear back.

This is not indicative of being open to public engagement and comments from those who may be potentially affected by these lands.

We also would like to know what other publicly available information there is about the project's alternatives and criteria, methodology, and assumptions used to analyze, compare, and identify the chosen alternatives?

How were those used to screen out and choose the different alternatives? What are the specifics of cost and cost-effectiveness differences between each alternative and --

(Connectivity disruption.)

MS. LUEBKE: -- which maritime and features are intended to be preserved, and therefore which maritime features would be lost in Alternative

5, which led to the loss of Alternative 5 being screened out?

And then, we also wanted to point out that as part of the process, each alternative is set up to be entirely distinct from one another. So there's -- while there's some mention that natural creatures as representative in an Alternative 5 could be integrated with the other Alternatives, we wonder why there isn't more of a hybrid alternative that takes the best features of each alternative and uses them where most appropriate.

We also are looking for clarity on the full differences between Alternative 4 and 4A, and any clarity on the impact that has to habitat in river.

We also would like to know if you've considered what's the impact of induced flooding on other unprotected and/or previously unaffected communities; we're particularly interested in communities of color and environmental justice communities.

And then, what other resources are you tapping into so as to not take money away from other areas across the City, resulting in inequitable

funding allocations just because you're protecting Wall Street? Thank you very much.

MS. REGAN: Thank you for your comment. Can you repeat your name and organization for the record? When you initially started speaking, it broke up a little bit.

MS. LUEBKE: Yeah. Sure. Because I was just getting into the car, and it was -- I'm with the SWIM Coalition that stands for Stormwater Infrastructure Matters, and my name is Michelle, M-I-C-H-E-L-L-E. The last name is Luebke, L-U-E-B-K-E.

I'm the program manager for the Coalition. Again, we represent over 70 different organizations devoted to clean water and environmental justice in the New York City area.

MS. REGAN: Thank you. I appreciate it. Next commenter will be Martine. Thank you for staying on.

MS. JOHANNESSEN: Thanks for bearing with me with the technical issues.

Hi, my name is Martine Johannessen and I'm the Land Use Consultant for Manhattan Community Board 1, speaking on behalf of the Board.

FiDi - Public Scoping Meeting

MCB1 first wants to thank EDC for meeting with the board last month to discuss this project and the partnership with U.S. Army Corps of Engineers.

The Board has already submitted detailed written comments on the Draft EIS, so today I'd like to briefly highlight the Board's key recommendations.

MCB1 supports advancing climbers lands (phonetic) in Lower Manhattan and securing the funding needed to protect, adapt, and transform the FiDi FORGE area, another critical piece of the broader Coastal Resiliency Strategy for Lower Manhattan.

The Board believes that the Draft EIS can be strengthened to ensure its analysis not only addresses future climate risks but also identifies opportunities to expand accessible public open space, reconnect neighborhoods to the waterfront, enhance ecological resilience, and create a more vibrant, connected, and resilient public realm.

First, the Draft EIS should better contextualize this analysis within the extensive climate resilience planning already underway in Lower

Manhattan. It should clearly explain how this project integrates with adjacent resilience projects, existing urban plans, the Army Corps' Harbor and Tributaries Study, and the broader Lower Manhattan Coastal Resiliency Strategy.

Second, the Draft EIS should align its goals and objectives with the FiDi-Seaport Climate Resilience Master Plan and the priorities MCB1 and the public have consistently identified through years of engagement.

Most critically, it should state as a goal the creation of high-quality public open space and increase public access to the waterfront. Furthermore, the EIS should evaluate the proposed resilience approaches not only on their ability to reduce flood risk but also on how well they expand public open space, improve waterfront access, integrate resilience infrastructuring to surrounding neighborhoods, strength and ethological resilience, and advance the other priorities repeatedly raised by the public.

Third, the Draft EIS currently treats the proposed approaches non-structural, structural on land, structural in water, and engineering of nature

as siloed and separate strategies.

Instead, it should develop and analyze integrated strategies that combine the strongest components of each consistent with the proposals already advanced with -- through the FiDi-Seaport Climate Resilience Master Plan.

The EIS should analyze how they can work together to deliver the greatest long-term benefits for Lower Manhattan.

Finally, a meaningful comparison of approaches requires understanding both the costs and their benefits. MCB1 urges EDC to ensure that the Draft EIS evaluates not only each alternative's environmental impacts but also its anticipated public benefits, such as flood protection, public open space, waterfront access, and ecological improvements.

This broader evaluation will help identify the alternative that delivers the greatest long-term climate resilience and public benefit for Lower Manhattan. Thank you.

MS. REGAN: Thank you, Martine. Our next commenter is Jim Wright.

Just a reminder to those who are

looking to speak: There's a pop-up window that will invite you to be a panelist. You have to accept that in order to be able to comment.

MR. WRIGHT: I'm sorry. I did not unmute. Let me start over, if that's okay.

My name -- good afternoon. My name is Jim Wright, Architect and Urban Designer representing the American Institute of Architects New York.

AIA New York is pleased to submit our observations and comments in the draft scope for FiDi FORGE. AIA New York represents New York -- supports New York City EDC's FiDi-Seaport Plan, which provides a multi-faceted coastal flood protection strategy to close the final gap of the City's Lower Manhattan coastal resiliency system.

EDC's FiDi-Seaport plan balances the seemingly conflicting goals of providing continuous coastal flood protection along the 0.9-mile segment Lower Manhattan shoreline, while maximizing pedestrian access to the waterfront, increasing public open space, facilitating unimpeded maritime uses and operations.

The plan incorporates nature-based solutions to supplement and reinforce the primary

structural elements of the coastal flood protection system is important to note that the plan adopted universal design standards meeting ADA requirements, which provide full access to all public spaces for users of all abilities.

To accomplish the ambitious project goals, AIA New York supports the City's strategy to enter into an agreement with U.S. Army Corps of Engineers to advance design studies and environmental reviews to evaluate the feasibility and suitability of achieving project goals outlined for the project. Thereby, unlocking opportunity for significant Federal cost-sharing funding for construction.

Following are some of our comments on the draft scope. AIA New York supports FiDi FORGE Alternative 4. The medium shoreline extension is the most appropriate option for Lower Manhattan's dense urban environment with its existing narrow public promenade behind the shoreline bulkheads.

Structural flood control system is the most developed component of the FiDi-Seaport Plan. The FiDi FORGE feasibility study should have asked for the design of all other components of the project at the same level of development to confirm program

criteria, feasibility of concept designs, construction timelines, and estimated costs.

And we want to highlight several missing components of the scope to strengthen the scope. The FiDi-Seaport Plan presents a once-in-a-generation opportunity to establish a purpose-built maritime freight dock and transloading facility that goes beyond the current plans to adapt existing pier infrastructure for this use.

The maritime freight hub designed for the City's future Blue Highways network should be a key component of FiDi FORGE. The study should consider eliminating Pier 15 and retaining the maritime ruminator of the working waterfront for continued recreation and entertainment use.

The inland stormwater management system should eliminate combined sewer overflows in the watershed area, and the feasibility should include a Basis of Design manual summarizing functional program requirements, variants for square footage allocations for relevant design criteria --

MS. REGAN: Thank you.

MR. WRIGHT: -- and design reference standards to be followed for the components of the

project. Thank you.

MS. REGAN: Thank you. Apologies, your time is up. If you want to submit anything in writing, please do so at the email that's below on the screen. Thank you for your time, Jim.

Our next presenter -- commenter will be Drew Gamils.

MR. GAMILS: Good afternoon. My name is Drew Gamils. I am the Senior Attorney at Riverkeeper.

We are a member-supported environmental organization dedicated to protecting and restoring the Hudson River, sources, sea, and safeguarding drinking water supplies for New York City.

Riverkeeper is concerned that the draft scope does not provide enough information for the public to meaningfully evaluate the project or its alternatives. This project proposes extensive in-water work if the draft scope does not clearly:

Describe the full volume and footprint comparisons for each alternative considered, the extent of overwater structures, or the construction methods that would be used.

Without that information, it is

impossible to fully understand or compare the environmental impacts of the alternatives. The EIS must thoroughly:

Evaluate the impacts of any dredging, pile driving, shoreline armoring, fill-in, and any other in-water construction on aquatic habitat, migratory fish, benthic communities, water qualities, stormwater, and shoreline habitat.

The draft scope acknowledges that effects on aquatic life will likely require mitigation but provides no information on what that mitigation would entail.

It should also provide sufficient information to compare the alternatives, including their environmental impacts, costs, and the detailed reasoning certain alternatives were screened out. That information is essential for meaningful public participation.

The public is being asked to comment on a project without the information necessary to do so. Riverkeeper urges EDC and the Army Corps to provide the missing information and extend the public comment period so that the public has a fair opportunity to review the project and submit informed comments that

can help assist developing a beneficial project. Thank you for the opportunity to testify today.

MS. REGAN: Thank you so much, Drew.

Our next commenter is M. Ruby.

(No response.)

MS. REGAN: All right. Our next commenter is Tyler Taba.

MR. TABA: Hi, can you hear me?

MS. REGAN: We can hear you.

MR. TABA: Okay. Great. Thank you so much.

Good afternoon, and thank you so much for the presentation today and the opportunity to testify. My name is Tyler Taba. I am the Director of Policy and Government Affairs at the Waterfront Alliance. We are a 19-year-old, New York City-based nonprofit organization dedicated to thriving and resilient waterfronts, shorelines, and coastlines.

We also serve as a backbone organization for the Rise to Resilience Coalition, which is a coalition of more than 110 organizations across New York and New Jersey who are committed to making climate resilience a more urgent policy and planning priority.

To start, I want to state Waterfront Alliance's support for EDC's Section 203 strategy to partner and work with the Army Corps of Engineers to advance waterfront and resilience design studies and environmental reviews like this one, especially as it could unlock the opportunity for significant federal cost-share funding for construction.

Waterfront Alliance has also proudly been a member of the Climate Coalition of Lower Manhattan and weighed in on the FiDi-Seaport Climate Resilience Plan over the last few years.

We support the efforts the City has been working toward to provide multi-layered flood protection and close the gap in the Lower Manhattan Coastal resilience portfolio.

And of course, we strongly encourage the City to use lessons learned here to scale resiliency projects across the rest of the City's shoreline, especially in disadvantaged and environmental justice communities.

We will provide more detailed written comments ahead of the July 23rd deadline, but that said, we are seeking clarity on some key questions and hope that EDC or Army Corps colleagues here could

respond to them following this meeting.

As mentioned, we have been engaged in the FiDi-Seaport Climate Resilience Plan for a number of years, and would like to better understand how the alternatives, particularly alternatives for -- excuse me, 4A are connected to the original plan, and if there are any major changes being made, which is a little difficult to assess from the renderings shared here and online on the website.

We respectfully ask the ability to communicate clearly before the July 23rd comment period deadline. Waterfront Alliance strongly supports the following aspects in no particular order of the plan that the City has been working on and would strongly recommend they remain in the project moving forward:

That is, a combination of flood walls and gateways, other coastal flood protection infrastructure integrated within landscape berms, natural and nature-based postal resilience strategies to reinforce flood protection and protect habitats, upgrades the maritime usage and pier infrastructure along the waterfront, and Inland stormwater management within the project area to manage impacts

from the extreme rainfall events.

Additionally, we're wondering if there were any other publicly available information regarding the project's alternatives and criteria used to analyze, compare, and identify the chosen alternatives and establish a proposed scope for the evaluation of the project's environmental impact.

And finally, do each of the alternatives need to be distinct from one another? While there is mention of natural nature-based features being integrated within other alternatives, we're wondering if a hybrid alternative that takes the best features of two or more alternatives would be feasible.

We understand there's another feedback opportunity coming up after the report is published but we hope to stay engaged in communications between now and then. And thanks again for the opportunity to testify.

MS. REGAN: Thank you for your comment.

Our next commenter is Robert Freudenberg.

MR. FREUDENBERG: Good afternoon. My name is Robert Freudenberg, and I'm the Vice

President for Energy, Environment, and Regional Plan Association, 100-year-old organization focused on the health, equity, prosperity, and sustainability of the New York Metro Region.

I want to thank EDC, the Army Corps, and the consultant teams for your presentation today and for the opportunity to provide comments on the FiDi FORGE project as it moves toward an integrated internal feasibility report and environmental assessment.

In addition to today's comments, we'll provide more detailed written comments ahead of next week's deadline. We are thrilled to see an assessment at this project advance as it represents the final link on the chain of protection for Lower Manhattan and needs to move ahead as quickly as possible.

We are so pleased that the EDC and the Army Corps are partnering to bring the best of local knowledge together with efficient resources to get the job done.

As the project moves into review, we are seeking assurances on a few key issues given the shift from a city-led effort to a joint effort with

the Corps.

In that light, we also strongly encourage the key features of the City's plan remain in the alternatives being assessed.

First, we ask the EDC and the Army Corps make clear that the alternatives being studied stem directly from the meaningful public process and deep technical analysis that resulted in the FiDi-Seaport Climate Resilience Master Plan.

We have requested information that would assure us of this; we have yet to receive responses to those questions and seek the opportunity once again here today.

If there are changes from that vision that are being assumed in Alternatives 4 and 4A, we respectfully ask that such information be shared ahead of the July 23rd deadline, and if more time is needed to provide the information, we might suggest a short extension to allow for review with community and interested stakeholders.

In terms of design, we also seek assurances that the thoughtful features of a master plan are included in the assessment of Alternatives 4 and 4A.

What made the master plan visual so attractive was the innovation and design sensitivity to ecology, and incorporation of nature-based features, as well as the attention to public access and connection to the waterfront.

Understanding that final design considerations often follows the assessment of function, we want to stress that the review must incorporate, where at a minimum, does not make assumptions that would preclude the following objectives:

One, minimizing impact to existing aquatic ecosystems;

Two, enhancing or supporting habitats through structural features, areas for penetration of light, protection from wave action, creation of new nature-based spaces, and restoration and stewardship opportunities;

Three, ensuring public space, public access, and connection to the waterfront;

Four, innovations in design that provide multiple layers of protection from different flood risks, including an esplanade built to withstand periodic flooding, and aspects that address

stormwater flooding behind protective coastal layers;

And finally, the preservation and enhancement of maritime uses and infrastructure. We understand the urgency in the need to move forward. We want to ensure that the project is assessed, moves forward, and incorporates the mix --

MS. REGAN: Thank you for your comment, and we look forward to your detailed comments being submitted at the email below.

We've gone through everyone we had on our list. I just want to make sure that there's -- if there's anyone else. We have another one? Yes, we have not gone through everyone, sorry.

We have Catherine Hughes, who is our last commenter on the list. If anyone else wants to comment after Catherine, please raise your hand, and you'll be added to the list.

MS. HUGHES: Thank you very much.

Good afternoon. My name is Catherine McVay Hughes, representing the Financial District Neighborhood Association.

FDNA supports the U.S. Army Corps of Engineers and the New York City EDC working together to bring FiDi FORGE into compliance with NEPA and

associated EIS.

This partnership unlocks Federal funding for up to 65 percent of eligible construction costs for flight control elements. FDNA supports strongly the FiDi FORGE approach for in-water with medium extension because it most resembles the locally preferred choice.

The FiDi-Seaport Comprehensive Master Plan integrating the waterfront resiliency infrastructure. This evolved through many years of public participation. Under the EIS analysis, please consider:

One, maximize publicly accessible passive and active green open space along the waterfront esplanade. FiDi's residential population is surging with increased commercial building conversions and new buildings but little green space, trees, or parks;

Two, remove the FDR ramp south of Brooklyn Bridge. It disrupts access to the East River Waterfront. This would address study objective number four: Maintain anchorages, vehicular or pedestrian access to or from waterfront destinations and historic tourist amenities in the study area;

Three, minimize footprint of bus loading and unloading area of Staten Island Ferry Terminal, incorporating as much in Peter Minuit Plaza into The Battery as possible;

Four, create a separate protected bike lane along the South Street roadway so that there are larger pockets of usable open space that can become a playground, ball field, or garden;

Four, address the abandoned leading tower that's 607-foot tall at 161 Maiden Lane on South Street next to the FDR and East River;

Six, minimize landside impacts during demolition and construction done with the New York City EDC's resiliency work at The Battery. This should include state-of-the-art best practices to minimize vibration, air, and noise pollution, reduced pollution by using electrical construction equipment and barges;

Seven, consider maintenance above or below grade and operational final project when designing, such as who will maintain the park space;

Eight, clarify how the FiDi area will be protected until FiDi FORGE is completed. The inter-flood protection measure extends from Wall

Street to the Bristol Bridge was implemented in 2019 is clearly inadequate;

Nine, continue to incorporate New York City Blue Highways program to move people and goods, reduce congestion, strengthen supply chain resilience;

Ten, incorporate well-maintained bathrooms at ferry terminals and city buildings. As we approach the 14 year anniversary of Superstorm Sandy, FiDi is the last piece of the Lower Manhattan Coastal Resiliency Project to be fully designed, funded, and constructed.

There's no other coastal storm risk management plan to protect FiDi. At the end, supports FiDi FORGE approach for --

MS. REGAN: Thank you for your comments. Please be sure to submit the remainder to the email below at the end of the screen.

We do have another person added to our list. I'd like to call Shino forward to be able to provide your comment, please.

MS. TANIKAWA: Sorry, was I called? It was switching over to the panelist mode; I couldn't tell.

MS. REGAN: Yes.

MS. TANIKAWA: Okay. Thank you so much. Good afternoon. My name is Shino Tanikawa. I am the Executive Director of the New York City Soil and Water Conservation District.

I wasn't planning on speaking today, so I'm not going to be as polished as some of the other speakers. So please forgive me.

I agree with some of the previous speakers in terms of combining some of these alternatives rather than taking an all-or-nothing approach with each alternative.

I do think we ought to look at combining some of these nature-based alternatives, and even managed retreat into a single comprehensive plan.

One of the reasons why I think such an approach might be important, it's because the water is going to have to go somewhere, and whether it's a sea wall or vegetated berms, that water will still have to travel upriver, downriver to adjacent communities, and that is a huge concern.

What I think we should be looking at, and this is not a popular idea, and I understand

that, but I think it's time we have to start thinking about creating areas for water to go. Meaning:

Creating some areas Inland where we intentionally flood, allowing that water to go, and combining nature-based and berms in other areas, and looking at just starting to think about what it looks like to be living with water, rather than keeping water out of where we want to be.

Sea level is -- is going to continue to rise. We do have a -- we are a coastal city, and if we don't start to think about allowing water to come onto our land in a very well planned and well-designed manner, we are pushing that water into adjacent communities.

And we keep planning this along the coast, eventually, that water's gonna go to Connecticut, Westchester County, New Jersey, Long Island. I really do think we have to take a very different approach to how we protect our buildings and assets. Thank you.

MS. REGAN: Thank you so much for your comment. I'm going to do one last call for anyone else who might want to be added to our list.

(No response.)

MS. REGAN: All right. Thank you for attending this afternoon's scoping meeting.

The transcription from tonight will be incorporated into the record. Written comments can still be provided through the QR code that would link you to the FiDi board's email.

Everyone, have a great evening. Thanks.

(Time noted: 4:00 p.m.)

C E R T I F I C A T E

STATE OF NEW YORK)
) ss.:
COUNTY OF QUEENS)

I, Soneka V. Cowles, a Stenographer and Notary Public within and for the State of New York, do hereby certify that the foregoing Statement On the Record, taken at the time and place aforesaid, is a true and correct transcription of the teleconference audio.

IN WITNESS WHEREOF, I have hereunto set my name this 16th day of July, 2026.



Soneka V. Cowles

Attachment E

NYCEDC Website Homepage for the Study



Environmental Review and Feasibility Study



FiDi FORGE Study Area

As the next step in advancing the Fortifying Our Resilient Growth and Economy (FiDi FORGE, also known as FiDi-Seaport Climate Resilience Plan), NYCEDC and the US Army Corps of Engineers (USACE) New York District intend to prepare an **Integrated Interim Feasibility Report and Environmental Impact Statement (EIS)** for a Coastal Storm Risk Management Section 203 Study for the FiDi FORGE study area. The Draft and Final Integrated Interim Report will be prepared in compliance with the National Environmental Policy Act (NEPA), concurrent with a Section 203 feasibility study of coastal storm risk management for the study area illustrated in the above map.

Section 203 Feasibility Study

Pursuing a Section 203 feasibility study under the Water Resources Development Act (WRDA) of 1986, FiDi FORGE could unlock federal funding covering up to 65 percent of eligible project design and construction costs. This legislation allows non-federal entities, such as NYCEDC, to conduct their own feasibility studies with technical guidance and review from USACE. This study will evaluate the feasibility of various coastal storm risk management measures within the study area. The findings will be documented in both a Draft and Final Integrated Interim Feasibility Report. It is anticipated that this report will ultimately be submitted to the US Congress for potential authorization and appropriation of funding.

The NEPA Process

The project is subject to review in accordance with the National Environmental Policy Act (NEPA), a federal process that requires federal agencies to consider the effects of their policies, projects, and funding of projects on the built and natural environments. This process ensures that environmental considerations are integrated into federal decision-making in a transparent, informed, and publicly accountable manner.

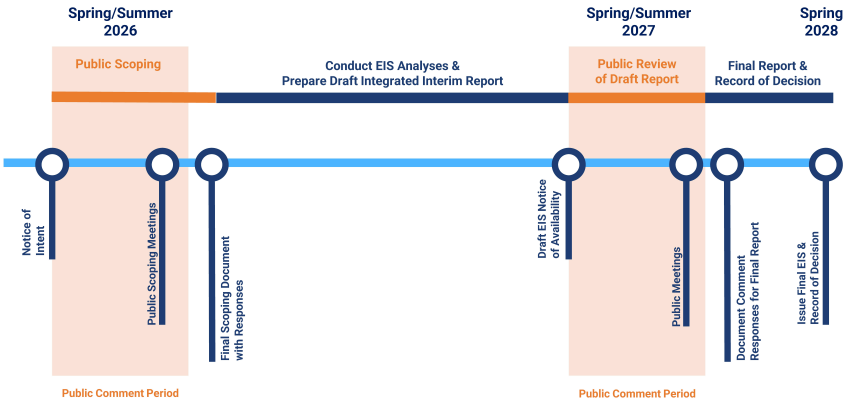
new structures over water. Given the scale and scope of effects, NYCEDC will be preparing an Environmental Impact Statement level of NEPA analysis for the project in coordination with the USACE, which will be incorporated into the Section 203 Feasibility Report (Integrated Interim Report).

Local environmental review, including New York City and State Environmental Quality Review (CEQR and SEQR), will be pursued at a later date when design is further advanced.

Scoping Period

The scoping period for FiDi FORGE began with a public notice on May 27, 2026, initiating the scoping period. The scoping period closed on July 23, 2026. During the scoping period, NYCEDC hosted three public meetings on June 23, June 25, and July 16. Meeting slides, poster boards, and recordings are provided at the bottom of this page.

There will be another opportunity for agencies and members of the public to participate and provide feedback on FiDi FORGE when the Draft Integrated Interim Report is published in spring 2027.



How to Provide Input

The scoping period for FiDi FORGE ended on July 23, 2026. Responses to comments received during the scoping period will be published on this website.

The next opportunity for formal public input will come with the release of the Draft Integrated Interim Report in spring 2027.

Any questions related to the status of the FiDiFORGE project can be submitted by email to the following email address: CENAN-FiDiFORGE-203-Study@usace.army.mil.

Feel free to check back frequently for updates on this process!

Key Documents

FiDi FORGE Notice of Intent
June 30, 2026

FiDi FORGE Scoping Presentation
June 25, 2026

FiDi FORGE Scoping Informational Boards

HDPORGE: EIS Scoping Additional Information Document
May 26, 2026

Recordings

- Scoping Meeting Recording - 7/16/26
- Scoping Meeting Recording - 6/25/26
- Scoping Meeting Public Comment - 6/23/26

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