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## Appendix F

### Public Review Comments & Responses

### **Montauk Point, New York**

On **May 4, 2016**, the U.S. Army Corps of Engineers, New York District, announced the availability of the Draft Environmental Assessment (EA) with Draft Finding of No Significant Impact (DFONSI) for the proposed Montauk Point, N.Y., Coastal Storm Risk Management Project and the opening of the 30-day review period for the public to submit written comments.

The public comment period closed **June 3, 2016**.

Comments received are attached, including Corps responses to major items raised during the review period.

Summary of Corps Responses to Public Comments received during Montauk Point, NY  
Draft HSLRR/EA public review period (Spring 2016).

1) Public Comment: Move lighthouse instead of recommended revetment plan:

**Corps Response:** Lighthouses have been moved and specific recent examples include Gay Head Lighthouse, Sankaty Head Lighthouse and Cape Hatteras Lighthouse. All of these relocated lighthouses are listed on the National Register of Historic Places and a few have been determined to be National Historic Landmarks and the eligibility of the properties as historic properties and/or National Historic Landmarks have withstood the relocation of these structures. This is likely because: 1) all of the extant structures contributing to their significance (Keeper's Houses, oil houses, etc.) were relocated with the associated tower; and 2) most of the structures, particularly those that are National Historic Landmarks, remained on the landforms with which they were originally associated. All of the New England lighthouses were moved back along the same elevation on the same bluffs as their original locations. Cape Hatteras was moved back onto firmer ground at the same elevation along the same barrier island on which it was originally located. All of the lighthouses retained their prominent view over the ocean and the significant view sheds to and from these structures remained the same. Also for these structures, relocation was determined to be the most economically favorable alternative for preservation instead of the installation of hard structures. For Cape Hatteras, hard structures had been previously constructed but additional structural measures were going to be more costly than moving the lighthouse.

When the current study of Montauk Point was originally initiated in the 1990s, the Montauk Point Light Station was only listed on the National Register of Historic Places. Since that time the property has been determined to be a National Historic Landmark with the landmark boundary encompassing the contributing structures, including: the Lighthouse Tower, the 1860 Keeper's Dwelling, and the 1860 Oil house. Structures identified as non-contributing resources to the National Historic Landmark include the Fire Control Station Tower, the earlier Keeper's dwelling, now a garage, and other modern structures. The Montauk Point Lighthouse was determined to have a high degree of location and setting with its prominent placement on the bluff, Turtle Hill, and its proximity to the Atlantic Ocean on three sides. It maintains its original significant view to and from the Atlantic Ocean, which was one of the factors in its construction. While the National Historic Landmark nomination does not specifically call out the likelihood of associated, intact archaeological deposits, it does call out 'Previously Existing Resources', which have the potential to contain archaeological deposits that would contribute to the significance of the Lighthouse. Previous archaeological investigations have identified the presence of archaeological remains associated with the various phases of the lighthouse's development as well as the use of the area by Native Americans.

Section 110(f) of the National Historic Preservation Act requires an agency, in this case the US Army Corps of Engineers, to "the maximum extent possible", to "undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking" (36 CFR 800.10(a)). Adverse effect refers to the alteration to the characteristics or features of a

historic property that qualify it for the National Register and, more importantly as a National Historic Landmark. National Historic Landmarks are those nationally significant historic places designated by the Secretary of the Interior because they possess exceptional value or quality in the interpretation of the heritage of the United States. Relocation of the Montauk Point Lighthouse and its contributing resources, as an undertaking, would be an adverse effect to the National Historic Landmark. Its removal from the bluff, which is a landscape feature that is the reason for siting the lighthouse in this location, would degrade its integrity of location and setting. Its view out over the Atlantic as well as the view of the lighthouse from the Atlantic Ocean would be altered as the lighthouse would no longer be located on the prominent bluff. Its visibility, which is a contributing feature of its significance, would be greatly decreased if moved to an inland elevation. The decision to cause an adverse effect to a National Historic Landmark must be weighed carefully in the consideration of alternatives. Additionally, the decision to cause an adverse effect to a National Historic Landmark must be made in coordination with the New York State Office of Parks, Recreation and Historic Preservation, the Secretary of the Interior, and the Advisory Council on Historic Preservation, as well as other interested parties. Relocation of the lighthouse must also consider the logistics of such a move and the potential risks to the physical structure. All of the previously noted lighthouses were moved landward across topography that was relatively flat and even; that is, there was no substantial change in elevation between its original and its new locations that would create a particular concern or require special engineering for the movement of the structures. They were lifted and moved straight back on rails; the Nauset and Cape San Blas Lighthouses, built of cast iron, were able to be moved by truck. The bluff, Turtle Hill, is at approximately 65 ft NGVD 1988 above sea level. The upper parking lot, located about 700 feet to the west, is at 42 ft NGVD 1988 above sea level. This would require the lighthouse and its associated structures (1860 Keepers and Oil Houses) to travel to a lower elevation. It would not be a move across even topography. It is anticipated that the condition of the tower would require its movement on the vertical rather than horizontal (laying the tower down). This movement would likely be significantly slower than any previous lighthouse relocations and would require a gradual lowering in elevation using a method by which the tower and other buildings can be supported to prevent leaning and toppling. An alternative to moving the lighthouse as a single piece would be to move the structure in pieces and reconstruct them on the new site. This would still require careful movement of structural pieces from the bluff to the new site.

Other associated costs with lighthouse relocation include: completing archaeological data recovery to recover the archaeological data associated with the lighthouse and its original use by Native Americans; archaeological investigations of the new site to ensure the installation of the tower would not have an effect on archaeological resources in this portion of the State Park; documentation of the Fire Control Station which is potentially individually eligible for its association with Harbor Defense during World War II, and of the current landscapes and scenic view shed.

As part of the 2005 coordination with the New York State Office of Parks, Recreation and Historic Preservation, the New York State Historic Preservation Office noted that moving the lighthouse was explored but was not selected. The New York State Historic Preservation Office voiced its opinion that the lighthouse should not be moved and was relieved that

relocation was no longer being considered. Given this coordination was undertaken prior to the NHL designation and with the status of the lighthouse to a National Historic Landmark, this opinion would be unchanged.

Consideration of the property's National Historic Landmark status is a determining factor in the selection of the alternative. National Historic Landmarks are given special consideration and decisions to cause an adverse effect require coordination with and concurrence by other agencies, including the Secretary of the Interior and the Advisory Council on Historic Preservation. This special status requires the selection of a practicable alternative that minimizes or eliminates the adverse effect.

2) Public Comment: Shoreline structures prohibited by Town of East Hampton LWRP:

**Corps Response:** There is already an existing structure on site. The new stone structure will replace the old structure which has been in place since 1992 and is currently not providing adequate protection to the historic structure. The new structure will be placed within the approximate location of the existing structure extending seaward to address the need for additional protection. All alternatives of the New York State Coastal Zone Management policy have been evaluated to the maximum extent practicable. The Department of State has deemed the project to be consistent with the state's policies. It is the position of the New York State Historic Preservation Office that the lighthouse should be preserved in place.

The Town of East Hampton Local Waterfront Revitalization Plan includes the Montauk Point Lighthouse as part of the inventory of historic resources identified in Historic Resources Policy No. 23. In addition, Policy No. 23 notes the importance of cultural landscapes related to historic resources, which would also include the bluff. Furthermore, similar to the National Historic Preservation Act, Policy No. 23 requires all "practicable means to protect" historic resources and limit or prevent a "significant adverse change" except for those resources which "have been certified as being imminently dangerous to life or public health" (Town of East Hampton 2007:VIII-23). Scenic Resources Policy Nos. 24-25 recognize the panoramic views from Montauk Point and the Lighthouse (Reach 7) as well as view of the lighthouse, shoreline and bluffs extending to the west (Reach 8) (Town of East Hampton 2007: IX-9). Policy No. 25 guidelines encourage the preservation of views of and from scenic structures, especially historic structures, to be preserved. Original land forms and historic landscapes should be maintained (Town of East Hampton 2007: IX-12 and IX-13). Preservation of the lighthouse in its current location would be in keeping with these policies as the relocation of the lighthouse would have an adverse effect on the National Historic Landmark as well as significantly alter the scenic view of Montauk Point itself.

3) Public Comment: Recommended revetment plan may impact surf wave quality:

**Corps Response:** In the Corps' 2005 Feasibility study, the Surfrider Foundation, Eastern Long Island Chapter, raised concerns regarding the impact of the proposed project on recreational surfing. In response to the Surfrider concerns, the Corps performed an analysis to determine the potential effect of the proposed project on near shore breaking waves. The

results of this analysis determined that the reflection coefficient for the existing revetment ranged from 0.30 to 0.33, whereas the reflection coefficient for the proposed revetment would range from 0.25 to 0.28, an approximate 15 percent reduction from that of the existing revetment. This reduction was due to the milder front slope and the greater porosity of the thick layers of randomly placed stone of the proposed revetment. Based upon the modeling results, the Corps concluded that implementation of the 2005 proposed project would have little to no impact on the quality or surfability of the waves in the offshore waters of Montauk Point, and may, in fact, have less impact than the existing structure. The proposed structure as designed in the HSLRR effort has the same slope and a similar foot print as the Feasibility Report structure, thus no impact is anticipated to surfing.

4) Public Comment: Recommended revetment plan may prevent natural beach migration or cause downdrift impacts:

**Corps Response:** The shoreline at Montauk Point has been armored since the mid-1940's. Comparison of the best available data show that between 1944 and 1991 an average of 3,900 cy per year of erosion has occurred in the location of the existing revetment. This material comes from any bluff sediment leaching through the revetment, loss of sea bottom fronting the revetment, and any loss of material on the bluff above the revetment. Given that the proposed upgrade to the existing revetment covers the same length of shoreline, the proposed structure is the same type of structure (i.e. rubble mound structure), and that any changes to the sea floor driven by changes in water level over time would be the same for both the existing structure and the upgraded structure, very little change in the amount of sediment released to the littoral system is expected as a result of the upgrade.

5) Public Comment: Recommended revetment plan may impact fishing and recreation:

**Corps Response:** Construction of the project would result in short-term, direct impacts to recreational uses, such as use of pedestrian trails and the revetment for fishing, by temporarily limiting and/or blocking access to the beachfront and the existing revetment. These short-term, direct impacts would primarily affect recreational fishing. Access impacts during construction may be reduced by allowing limited access for fishing during the construction period to the maximum extent practicable without causing a safety hazard. Eventually the entire revetment and staging areas immediately adjacent to the northern and southern ends of the revetment would need to be closed to the public during construction. During this temporary time, fishing is still possible from the adjacent beach areas.

6) Public Comment: Construction issues/impacts to area during project construction:

**Corps Response:** Stone could be delivered to the project site via barge, truck, and/or combination of truck and barge. Recent Corps stone construction projects have used both trucks and/or barges. Delivery methods depend on location of the stone source and construction site, and is ultimately determined by the construction contractor. Every effort will be made during the design phase to scope and coordinate the least impactful method for stone delivery during the project's construction.

**Montauk Point, NY**

Public comments received during review period are attached.

Pls receive this as a formal comment against the Montauk lighthouse project

Beth Pollack

[REDACTED]

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Move the structure back.

Rav Freidel

[REDACTED]

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I own a house on Ditch Plains road and have fished montauk since 1980. In my view piling rocks around the point is a futile exercise. The force of the ocean concentrated past the point on the turn of each tide is huge. It will inevitably scour out the ocean floor supporting the rocky revetment and once the revetment falls into the ocean after lack of support the reef it forms will cause accelerated erosion through the breaking surf it will create.

Do what they did on Block Island and move the light house back. My brother is a partner in the architectural firm, The Newport Collaborative. It was their project that moved the Southeast Light back from the Mohegan Bluffs.

William Gardiner

[REDACTED]

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Please listen to the community of Montauk and mariners living on this island when we beg the Army Corps to not touch our pristine and sacred beaches. We hated the project that was completed to help the hotels, which left our beach looking like complete trash. Please do not go forward with the lighthouse plans.

Sincerely,

Kat

Lifetime resident of Montauk

[REDACTED]

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To whom it may concern : When coastal buildings or roads are threatened, usually the first suggestion is to "harden" the coast with a seawall. Seawalls are structures built of concrete, wood, steel or boulders that run parallel to the beach at the land/water interface. They may also be called bulkheads or revetments. They are designed to protect structures by stopping



the natural movement of sand by the waves. If the walls are maintained they may hold back the ocean temporarily. The construction of a seawall usually displaces the open beach that it is built upon. They also prevent the natural landward migration of an eroding beach.

See this gallery of photos of seawalls, revetments and other attempts at shoreline armoring from around the world.

When waves hit a smooth, solid seawall, the wave is reflected back towards the ocean. This can make matters worse. The reflected wave (the backwash) takes beach sand with it. Both the beach and the surf may disappear.

Seawalls can cause increased erosion in adjacent areas of the beach that do not have seawalls. This so-called "flanking erosion" takes place at the ends of seawalls. Wave energy can be reflected from a seawall sideways along the shore, causing coastal bluffs without protection to erode faster. When it is necessary to build a seawall, it should have a sloped (not vertical) face. Seawalls should also have pockets and grooves in them that will use up the energy of the waves instead of reflecting it.

Usually the most cost-effective, environmental solution is to move the building away from danger. Building seawalls will buy time against natural processes, but it will not "solve the problem" of erosion by waves.

Please reference the disaster that ensued after a similar effort was made in the 1970s in Santa Barbara! They lost miles of beachfront property. The town was devastated! It created such a horrendous problem that they still cannot solve it.

Alex



Mr Robert Smith,

My name is Jason Deland.  
I am a resident of Montauk.

I am writing in regards to the proposed dredging along Sound View Road.

I am very concerned about the plan to allow larger commercial fishing boats into the harbor. I believe that this would crush local fishermen and further hurt striped bass populations. In addition, it would forever change Montauk's family first small business culture.

I have witnessed first-hand other ports made accessible for commercial fishing interests and in every case up and down the east coast the community regrets it.

I hope you take these views into consideration.  
Regards,

Jason DeLand - Montauk New York  
[REDACTED]

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Dear Sir,

I live in Montauk -- have been here for decades. I am concerned about the recent talk of replicating the beach "revitalization" project the ACOE implemented at the historic lighthouse.

There has been very little notice about the proposed project and limited time for discussion.

A recent PBS film claims the bluffs have not lost any sediment, so why the need? If the lighthouse is in danger, why not consider moving it instead of disturbing the ecosystem (which would impact fishing, surfing and tourism -- all reasons we love Montauk!)?

Please consider all options before moving ahead, and let the local voices be heard.

Thank you.

Sincerely,

Marjorie

Marjorie Spitz

Please engage in daily random acts of kindness.  
[REDACTED]

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To: Robert J Smith- Project Biologist. US Army Corp of Engineers; NY District  
Robert.j.smith@usace.army.mil

ATTENTION: CNAN-PL-E

Dear Mr. Smith,

I am writing to express my opposition to the revetment plan for the Montauk Lighthouse. Not only is it horrific to hear that Sandy Relief Funds would be spent on this project, that was in no way due to hurricane Sandy, while countless homeowners battle to get help rebuilding their homes and lives that were shattered by Sandy. But the seawall is also prohibited in Montauk according to our local, State and Federal laws and regulations. Structures accelerate erosion in the surrounding areas, and another seawall will further prevent the natural process of sand migration, as the natural moving shoreline provides much needed sand migrations to beaches west of the lighthouse. The only logical, long term solution is to move the lighthouse landward, as we should be doing along all of our coasts. Please AT LEAST give time for public comments at Town meetings. The residents of Montauk feel as if Army Corp of Engineers is acting hastily and using poor judgment, and poor interpretations of our Coastal Management Program, in turn ruin our environment to

the point of no return. Please stop building seawalls in Montauk, we do NOT want our shorelines armored!!

Sincerely,  
Kimberly Wells

[REDACTED]

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Dear Robert J. Smith,

I am writing to express my concerns with the Montauk lighthouse rock revetment project. First and foremost, there should be a longer public comment period. Public hearings should be made available and published through online township and recreational pages.

Armoring has proven to be a suspect method for erosion protection. Local townships, such as East Hampton, have elected to not pursue this method.

The Draft HSLRR by the USACOE report dated April 2016 fails to deeply explore the alternative of relocating the lighthouse.

Additionally, the impacts of down drift beaches and the economic impacts of a potentially decreased surfing wave quality have been fully considered.

Please extend the public comment period and provide public hearings spanning both eastern and western so that New Yorkers can be made fully aware of the impacts of one of our most treasured landscapes and landmarks.

Best regards,  
Nick Allen-Sandoz

[REDACTED]

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Mr Smith,

I am a full time resident of montauk for the past 38 years. I am a dedicated surfer and surf caster. I have spent hundreds if not thousands of hours surfing and fishing under the montauk light house. The recent meant project will seriously alter or eliminate the surf breaks known as Alamo and turtles cove. The fishing there has never been the same after the last reventment project. I fear this project will take away two of montauk a most important recreation opportunities by affecting the surf breaks and fishing.

Most important , in my opinion after observing the lighthouse in every major storm and hurricane year round for many years the current reventment is protecting the light house as it is now.

Please reconsider this plan.

Your truly,

John yashinowsky

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Dear Mr. Smith,

I am a Montauk resident and very concerned about the lighthouse project.

I'm told we Montaukers need to voice our concerns. From my perspective the Army Corp's actions were highly unimpressive and ultimately made MTK less beautiful and possibly more vulnerable. In a few words, i don't trust them to do what's best for my community or this rarified environment. Thank you.

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To whom it may concern,

I am not in favor of a rock revetment to attempt to "save" the lighthouse . Any hardened structures on the beach cause erosion on either side. It changes the natural flow of the water and interrupts the natural replenishment of sand by the ocean.

It's bad enough a natural dune was removed to place Geotubes (hardened structures) in Montauk.....one disaster doesn't need to be followed by another one!

That could end up scouring out the very mess that was just completed .

I support moving the lighthouse back instead, it's been done successfully with NO disturbance to the shoreline. I would suggest that we don't do anymore damage to the shoreline .

Thank you  
Pat Griffith

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Robert,

My name is Tyler Armstrong, I am an East Hampton Town Trustee, and a college graduate in Ecology. I enjoy the sciences and the natural world, I want to keep our beaches full and natural while protecting our communities from coastal flooding and sea level rise.

I do not think the current plan for Montauk Lighthouse is the right option, neither economically nor for the future of our beaches.

Multiple operations to further harden Montauk Point are expensive over time and interfere with the natural process of longshore drift that feeds our western beaches. I urge you to reconsider and pursue an option that involves moving the lighthouse back, it will have to be done eventually.

We have this opportunity for funding now and we should be focusing it on moving structures like this out of harms way from coastal erosion, flooding, and sea level rise. This takes planning and study and the sooner we begin the better off we will be.

Adding more rock out into the sea will cut off more sand from the natural drift process, and cause more drastic erosion on the downshore beaches. The best course of action to protect the structure is to move it out of harms way.

Montauk point is supposed to erode naturally and feed western beaches. Interfering with that process only causes further problems. If the lighthouse is threatened, moving it back is the best option for all of our beaches, and our wallets.

Moving development away from the shore, and reducing hard structures in coastal areas, especially important points in the longshore current, is the only sustainable way to protect the integrity of our beaches for the future.

Thank you for your time.  
- Tyler Armstrong



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June 2, 2016

Robert Smith, Project

U.S. Army Corps of  
York District Attn: CENAN-PL-E

26 Federal Plaza, Rm. 2131 New York, NY 10278-0090

Submitted electronically via email to: [Robert.i.smith@usace.army.mil](mailto:Robert.i.smith@usace.army.mil)

*RE: Draft Hurricane Sandy Limited Reevaluation Report*

Dear Mr. Smith,



Biologist

Engineers, New

The Ditch Plains Association (DPA), a Montauk community organization of over 500 members, is in support of protecting the historic Montauk Lighthouse. However, DPA is also concerned with the unintended consequences of any well-intentioned action where a thorough and complete analysis of its effects has not been conducted. The reliance of a dated EIS that was done in 2005 that considered a

project that is materially different from what is proposed today is in contradiction of NEPA's intent and standards. The material differences include a meaningfully increased seaward projection of the revetment, significantly larger rock, and a revetment toe that is less secure due to a design change. In addition, the project is in direct violation of the East Hampton Town LWRP that prohibits the use of rock on south facing shores due the detrimental effects of such structures to surrounding areas. The project design may also need to be modified since East Hampton Town may be unable to permit its land to be used for construction activities related to this project, as contemplated by the Corps, because this project is in violation of Town Law under the LWRP. The significant modification of the scope of the project and the circumvention of established Town Coastal Law should clearly mandate, under NEPA standards, that an EIS, specific to this project as it is currently proposed, be conducted prior to the commencement of this project.

The recreational and historic value of the Montauk Point surrounding area that has significant revenue from visitors and residents who come to surf, fish, hike and picnic cannot be compromised by taking shortcuts and rubber-stamping this project through a cursory Environmental Assessment that does not fully consider the possible detrimental effects to surf breaks, fishing grounds and the magnificent bluffs of a project of this scale and scope.


The alternative of moving the lighthouse, as has been done successfully with other historic lighthouses, has not received a serious review because of the understandable sentimental goal of keeping it on the original grounds and because of the desire to spend as little money as possible. However, an engineering study incorporating the long-term cost/benefit analysis under a clear and unbiased light that takes into account the environmental and recreational costs of a degraded surfing and fishing environment has not been conducted. Moreover, the benefit of moving the lighthouse vis a vis rock reinforcement may be meaningfully understated as we are confronted with repeated scientific studies suggesting that sea level rise and storm frequency/intensity projections may need to be ratcheted upwards as climate change is occurring at a faster rate than was envisioned.

The actions contemplated by this project without being informed by a current EIS is akin to the trader who blindly seeks short-term gains rather than the studious investor that seeks long-term returns. For those of us who live and recreate here, we must act like stewards and long-term investors with our vital environmental resources as we diligently seek to protect our historic lighthouse. As we seek a long-term solution for protecting the lighthouse, retreat must be on the table just as it must for the rest of the Town. The revetment has a life expectancy of 73 years, whereas moving the lighthouse back will give it a life of hundreds of years without the collateral damage of a rock revetment. Why has this option not been fully vetted? Perhaps an honest Environmental Impact Statement and a thorough cost/benefit analysis of all options utilizing the more aggressive sea level rise predictions would result in retreat having the superior cost/benefit analysis? At a minimum, the need for an EIS, as mandated under NEPA, is clear. Thank you for the opportunity to comment on this project.

Sincerely yours,

Louis Cortese

DPA, Member of the Board



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Dear Robert Smith,

I would like to share my comments on the proposed Army Corps Rock Revetment at the Montauk Lighthouse:

As a year-round resident of East Hampton, I am concerned to learn of a proposed hard structure as a response to erosion. I believe this goes against what the town of East Hampton has already decided when it declared that armoring is not the right solution for erosion.

I truly think this rock revetment would send the wrong message to the community of East Hampton, and set a bad example for erosion control measures. It is not sustainable, and it goes against East Hampton's own Local Waterfront Revitalization Plan (LWRP). I believe other alternatives must be explored first, in order to ensure that what is done is truly a long-term solution.

Thank you kindly for your attention to this matter.

Sincerely,  
Scott McDermott



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Robert Smith, Project Biologist  
U.S. Army Corps of Engineers, New York District  
Attn: CENAN-PL-E  
26 Federal Plaza, Rm. 2131  
New York, NY 10278-0090  
(917) 790-8729 Robert.j.smith@usace.army.mil

Chris Manthey Public Comment re: April 2016 Draft Limited Re-Evaluation Report (LRR)

A substantial portion of the funds for this project will be provided under Public Law 113-2, The Disaster Relief Appropriations Act 2013,<sup>1</sup> which provides:

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<sup>1</sup> <https://www.congress.gov/113/plaws/publ2/PLAW-113publ2.pdf>

*for necessary expenses related to the consequences of Hurricane Sandy, \$3,461,000,000, to remain available until expended to rehabilitate, repair and construct United States Army Corps of Engineers projects: Provided, That \$2,902,000,000 of the funds provided under this heading shall be used to reduce future flood risk in ways that will support the long-term sustainability of the coastal ecosystem and communities and reduce the economic costs and risks associated with large-scale flood and storm events in areas along the Atlantic Coast within the boundaries of the North Atlantic Division of the Corps that were affected by Hurricane Sandy*

While it is unclear if this funding is in the \$2.9 billion, the April 2016 Draft LRR<sup>2</sup> also notes that:

*“When determining how to move forward in implementing project specific measures in accordance with the funding and direction in the Act, the Corps will perform an expedited limited re-evaluation that addresses resiliency, economics, risks, environmental compliance, and long-term sustainability...”*

The LRR fails to do this because it does not adequately evaluate the relocation alternative, which is superior to the proposed revetment in every of the above-listed criteria (resiliency, economics, risks, environmental compliance, and long-term sustainability). In this LRR, the relocation alternative is mentioned only once (Page 6), wherein the authors merely note it was one of the evaluated alternatives in the 2005 Feasibility Study<sup>3</sup>. This is precisely what Congress was attempting to avoid when they provided the extraordinary and unprecedented Sandy funding on an emergency basis on January 29<sup>th</sup>, 2013, only 3 months after the storm. Knowing that they could not provide the usual and necessary scrutiny under emergency circumstances, these criteria were included to forestall a repetition of the “business as usual” approach, which had in some instances had actually increased the risk to both life and property. This LRR fails the Congress’ intent, and fails it completely.

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<http://www.nan.usace.army.mil/Portals/37/docs/civilworks/projects/ny/coast/Montpt/00-Montauk Pt DRAFT HSLRR APR 2016.pdf>

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<http://www.nan.usace.army.mil/Portals/37/docs/civilworks/projects/ny/coast/fimp/Montauk PT NY-HurrStormDmgRed-FinalFeas EIS-Oct 2005-Combined.pdf>



## Economics

The revetment is predicted to cost \$18 million and last 50 years. While the relocation alternative was inexplicably (or maybe explicably, in an attempt not to alert readers how attractive and compliant with Public Law 113-2 the relocation alternative is) left out of the main body of the report, it is included in Appendix 4, Economics Appendix <sup>4</sup>. As noted on Pages 4-5 of that report,

*“the estimated cost of moving the Montauk Point Lighthouse complex and complete historical properties mitigation is \$22,090,000 (October 2014 price level)<sup>5</sup> ..This figure takes into account the creation of raised grades landward of the present location of the lighthouse for the move.”*

One simple way of evaluating the respective cost of revetment vs. relocation is to recognize that while the revetment will cost 22% more in initial cost (\$22m-\$18m=\$4m, \$4m/\$18m=22%). However, in an estimated 50 years (the project design life) the revetment cost will almost double that of relocation, when another revetment modification/addition would be expected. If the lighthouse is relocated approximately 1000 feet to the back of the existing parking lot and we assume a bluff recession rate of 3 ft/yr<sup>6</sup> (more than double that of historical rate of 1.2 feet/yr cited on Page 18 of the 2005 Feasibility Report), the lighthouse would not need to be re-relocated for approximately 300 years. In contrast, the 50-year life span revetments would need to be rebuilt 5 times (+50, +100, +150, +200, +250) before both the revetment and relocation would need repeating in 300 years. Thus the revetment would have to be done 6 times at an approximate cost of \$108 million vs. the \$22 million relocation alternative.

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<http://www.nan.usace.army.mil/Portals/37/docs/civilworks/projects/ny/coast/Montpt/04-MP Appendix 4. Economics.pdf>

<sup>5</sup> It is interesting to note that even 10 years later, the new estimated cost of relocation is \$8 million less the \$28 million estimated in the 2005 Feasibility report.

<sup>6</sup> Analyzing bluff erosion rates on an annual basis is a fundamentally flawed approach, as bluffs tend to erode very little in the absence of a serious storm, but a very lot when one occurs. However, because of the relatively long period of observations (approximately 1870-present) this flaw may be less serious in this instance.

The Economics Appendix attempts to account for numerous other effects of protecting the lighthouse via a revetment vs. not building it. It does not estimate the difference in ancillary economic effects in revetment vs. relocation scenarios. While the views both from and of the lighthouse are more attractive in its current position vs. a relocated position, Page 3 of the Economics Appendix notes that only 10% of the visitors to the State Park from 2004-2012 visited the lighthouse, indicating the economic effect of reduced visitation, if it occurred, would be minimal.

### Risks

Relocation would provide complete protection against damage from ocean waves. The proposed revetment is designed only for a 73-year storm, Plan 2B in the 2005 Feasibility Report. As noted on Pages 59-60 therein:

*The results show that the critical level for significant damage initiation of the vegetative terracing is exceeded above a 200-year event for Plan 2A, a 100-year event for Plan 2B and greater than a 15-year event for Plan 2C. The existing structure exhibits damaging overtopping rates during events greater than a 10-year level.*

The 2005 Feasibility Report doesn't indicate what level and frequency of a single storm it would take to cause damage to the vegetative terracing to the extent that would cause the lighthouse to collapse. Given that the bluff was 300 feet away upon construction in 1796 and is now approximately 120 feet away, the bluff lost only 180 feet in 220 years. However, it isn't zero like the relocation alternative. Based upon the Corps' storm frequency/impact data, in addition to the 6 replacement/additions, we can expect an additional 2-3 instances of damaging overtopping rates that might require yet more work on the revetment.

### Resiliency

On Page 24 the LRR provides 2 definitions of resiliency

*Definition 1 - USACE-NOAA white paper "Infrastructure Systems Rebuilding Principles" (Appendix 8): "Resilience. Ability to adapt to changing conditions and withstand and rapidly recover from disruption due to emergencies".*

*Definition 2 - "Disaster Resilience: A National Imperative" by the National Academies Press (NAP) (2012): ". . . the ability to prepare and plan for, absorb, recover from, and more successfully adapt to adverse events". [Definition 2]*

As noted above, the 73-year plan design is expected to result in 2-3 damaging events to the vegetative terracing if not the lighthouse itself. Thus the revetment plan actually prepares and plans to incur adverse events, not the ability to recover from them. And where will that money come from? As noted earlier, the Sandy funding was unprecedented, and there's a very good chance that 50 years hence the federal government will delay or even deny funding to add yet more stone, leaving state and/or local interests with the unenviable choice of paying millions on their own or letting the lighthouse fall into the ocean.

### Environmental Compliance/Sustainability

Coastal armoring is against the stated policy of both the local (East Hampton) and state (New York) partners. The placement of revetments is known to reduce the amount of beach in front of the them, increase erosion in adjacent areas, and reduce the amount available for longshore transport by the ecosystem. In fact, when I commented upon this in 2005, the response on Page 329 of the 2005 Feasibility Report noted that increased erosion might be occurring because of the existing revetment:

*Shoreline change mapping for the Turtle Cove area shows approximately a 2-ft/yr increase in retreat rate in the post-revetment period (1938-to 1995) as compared to the pre-revetment period (1870-1938), which may be due in part to the construction of the existing revetment, as well as to all other factors contributing to shoreline erosion.*

With regards to reduction in total sand available to the littoral systems, it may be argued that this effect is minimal. The Corps does just that in its response to my 2005 comment, estimating that the sand denied to the Atlantic shore system is approximately 3000 cy/yr and 2000 cy/yr to the Block Island Sound system. However, on the Atlantic side both Ditch Plains and Downtown Montauk are experiencing erosion that has necessitated placement of sand, and on the Block Island Sound Side the homeowners at Culloden have essentially lost their beach. This project makes that situation worse, even if incrementally, and thus is less environmentally compliant and sustainable than the relocation alternative.

### Comments and Conclusions

How have we arrived at a recommended plan that is at odds with the all of the criteria of Public Law 113-2? The Montauk Historical Society, owners of the

lighthouse, has been fiercely resistant to any consideration of the relocation alternative. They should be commended for their decades-long work begun in the late-1960s to maintain the lighthouse and prevent it falling into the ocean. Indeed, it might very well be there already but for their efforts. But they should not be congratulated for their intellectually dishonest characterization of relocation as an impossible or economically exorbitant alternative e.g. “it would have to be taken apart brick by brick,” nor for their attempted exclusion of the public at large from the participation in the decision process: “Suddenly, they come along and think they know better, and they’re trying to stop this .... They have no scientific dialogue, they just say, ‘We’re for saving the beach.’ ”<sup>7</sup> As noted on Page 3 of the 2005 Feasibility Report,

*“However, although the MHS is clearly a single, private landowner, they must, by deed restriction and State charter, act as a public entity akin to agencies of State and local governments ... Under the deed and charter, the MHS cannot structure and constrain uses of the property.”*

Unfortunately, to date the actual agencies of federal, state and local governments, in contravention of Public Law 113-2, appear willing to cede this decision to the Montauk Historical Society. I am not.

Sincerely,

Chris Manthey

Local Address: [REDACTED]

Mailing Address: [REDACTED]

Email Address: [REDACTED]

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As a Southampton resident, I have surfed the spots around the lighthouse for over 17 years. The spot directly in front of the lighthouse is my favorite spot on Long Island, and is an integral part of the surfing community. Further rock revetment would create what is known as backwash, i.e. wave energy would refract off the rocks and make the waves in front unstable and therefore unridable. Please just move the lighthouse back, it seems to be a more sustainable solution. The community of Montauk will not let these spots be destroyed. Please read this article on why the lighthouse should be moved

Blocked <https://easternli.surfrider.org/talking-points-for-comments-on-lighthouse-revetment/>

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-Robby



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Hi Robert,

I am a Montauk resident and am writing to you regarding the rock revetment of the Montauk Lighthouse. Based on information provided to me by the Eastern LI Chapter of Surfrider, I think that protecting the structure of the lighthouse is most important, not the actual bluff, as the bluff would not need protecting if the lighthouse was moved. This would be a more long term protection plan and is very doable. I propose attempting this first, asking the tax payers if they will support it, as the bluff provides important ecological services to down-drift beaches.

This can be done! I've even seen a Nova episode on how moving a lighthouse is possible -  
Blocked<http://www.pbs.org/wgbh/nova/tech/lighthouse-rescue.html>

And I grew up in a town (Katonah, NY) where the early settlers moved an entire town in 1895, no less! Blocked<http://www.katonahny.com/AboutKatonah.html>

Please consider this option before making any changes to a natural bluff; enough damage has already been done to our beaches in town.

Thank you,

Sarah E. Donna



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Mr. Smith,

I am a long-time Montauk resident and serve on a variety of Town committees as a volunteer. I recently moved to Amagansett, but my family currently has 4 generations living in Montauk right now. I oppose this project on a number of grounds, but the most important one is the outright refusal to pursue moving the lighthouse. Many communities have used this common sense approach to preserving their lighthouses. I find it strange that no significant exploration of this option has been done. This solution has been dismissed outright or otherwise assigned outrageous unsubstantiated costs in order to dissuade the public.

In addition these points must be taken into account.

\* East Hampton Coastal Legislation – Since the original ACE study in 2005, the town of East Hampton passed coastal legislation in the form of the LWRP, the Local Waterfront Revitalization Program which essentially outlaws hard structures and armoring on our beaches & coast lines.. The proposed project contradicts what a democratically elected

governing body passed with community support. The Montauk Lighthouse is in East Hampton, and the town has precluded construction of rock seawalls on its coast.

\* **Dangerous Precedent** – If built, this rock revetment would send a message to every property owner on Eastern Long Island that the solution to naturally eroding bluff is a large pile of rocks at the base of the bluff. Not only is this anathema in a town that has taken a stand against hard structures, it would doom our local beaches. Armoring has been outlawed under East Hampton’s Local Waterfront Revitalization Plan, LWRP, based on the understanding that armoring on beaches causes them to disappear.

\* **Contradictions** – Please take 2 minutes to view a portion of the recent PBS -NOVA <<https://www.facebook.com/NOVAonline/videos/vb.29589997195/10153572215897196/?type=2&theater>> broadcast during which Mr. Greg Donohue, Erosion Control Manager for Montauk Lighthouse stipulates that “We have not lost a wheelbarrow full of sediment off this project,” (since building the terrace and revetment.) Yet the Army Corps assessments from 2005 and 2016 both claim the revetment is “inadequate”, is degrading, and mentions the “progressive instability” of the bluff. Both of these things can’t be true. Is it the ACE contention that the professional responsible for managing erosion at the lighthouse at least since the 1990s is wrong?

\* **Surfing Resources Not Protected** – Three surfing areas could potentially be impacted by the project and nothing in the HSLRR nor in the original 2005 Study provides definitive evidence to the contrary. The economic importance of surfing in this area has gone up dramatically since the 2005 study. In 2006, 2007 and 2008, the surfing community fought the prohibition on surfing around the Lighthouse. We won when a judge declared that there is no rule prohibiting surfing around the Lighthouse. Still, insultingly, signs persist saying no surfing is allowed. Furthermore a Surfing Museum has opened at the Montauk Lighthouse complex underscoring the importance of surfing in this community. Therefore the surfing resources need to be evaluated as thoroughly as biological resources are for a project like this.

\* **Protect the structure not the bluff** – The Hurricane Sandy LRR talks about protecting the bluff (p. i). While it is obvious that the lighthouse is on the bluff, the bluff would not need protecting if the lighthouse was moved. The main goal of the Corps should be providing the lighthouse complex with safe, long-term protection. The most long-lasting solution is moving the lighthouse. The bluff provides important ecological services to down-drift beaches. The Army Corps’ mind set of protecting a structure and the land it stands on from sea level rise is limiting and dangerous. The best protection comes from moving structures out of harm’s way.

\* **Moving Not Explored** - The option of moving the Lighthouse was not revisited in the HSLRR. The Feasibility Study from 2005 said moving the Lighthouse would cost \$27 Million (p.44) but there was no discussion of the future savings by not having to build, re-build, and maintain the rock revetment for hundreds of years. The whole purpose of the post-Sandy Reevaluation was to consider the increased risk from Sea Level Rise, and to evaluate

the project for “long term sustainability” (p. 25). Clearly moving the lighthouse would be a longer-term and more sustainable solution than yet another rock revetment.

\* **Expend Scarce Financial Resources Wisely & Where There is Real Need** – Millions of citizens are still suffering during the re-building following Hurricane Sandy & other natural disasters. Scarce financial resources should be spent to help these citizens recuperate rather than to construct a seawall where it is not indicated. In a federal budget of limited resources, this \$18 Million could be better spent elsewhere in places that actually need help.

\* **Surfing Access** - It is mentioned that during construction, fishing and surfing will be allowed on the beach next to the lighthouse, (p. 12). But only fishing organizations are mentioned as groups that will be consulted. Surfing groups like the Surfrider Foundation need to be reached out to regarding access during and after construction as equals with fishing organizations.

\* **Long Term Sustainability** - The preferred alternative in the HSLRR does not meet the Corps own standard of Long Term Sustainability, (p. 26). Each rock revetment at the Lighthouse has not lasted as long as expected. This rock revetment is given a possible life span of 73 years. There is no doubt that moving the Lighthouse would protect it from naturally occurring erosion for hundreds of years. A longer-lasting solution is by definition more sustainable for the long-term

\* **Poor Public Process** – Congress and the ACE have indicated that the Hurricane Sandy disaster was a significant event & response to it to requires a reevaluation. We agree. Consequently, the public should have to opportunity to be heard regarding this project. There should be a longer public comment period, as well as public hearings in the community. There was no notice in the local papers about this project until June 2, the day prior to the deadline for comment. The HSLRR stresses the importance of the Lighthouse complex to this community. ACE should therefore allow more time and a meaningful forum for people to digest, understand, and question the hundreds of new pages produced by this HSLRR and its appendices.

Jay Fruin



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Robert Smith, Project Biologist:

I am a resident of Montauk, NY, & I wish to comment on the expanded revetment at Montauk Lighthouse proposed by the Army Corp of Engineers (ACE). Following are my comments.

\* East Hampton Coastal Legislation – Since the original ACE study in 2005, the town of East Hampton passed coastal legislation in the form of the LWRP, the Local Waterfront Revitalization Program which essentially outlaws hard structures and armoring on our beaches & coast lines.. The proposed project contradicts what a democratically elected governing body passed with community support. The Montauk Lighthouse is in East Hampton, and the town has precluded construction of rock seawalls on its coast.

\* Dangerous Precedent – If built, this rock revetment would send a message to every property owner on Eastern Long Island that the solution to naturally eroding bluff is a large pile of rocks at the base of the bluff. Not only is this anathema in a town that has taken a stand against hard structures, it would doom our local beaches. Armoring has been outlawed under East Hampton’s Local Waterfront Revitalization Plan, LWRP, based on the understanding that armoring on beaches causes them to disappear.

\* Contradictions – Please take 2 minutes to view a portion of the recent PBS -NOVA <[Blockedhttps://www.facebook.com/NOVAonline/videos/vb.29589997195/10153572215897196/?type=2&theater](https://www.facebook.com/NOVAonline/videos/vb.29589997195/10153572215897196/?type=2&theater)> broadcast during which Mr. Greg Donohue, Erosion Control Manager for Montauk Lighthouse stipulates that “We have not lost a wheelbarrow full of sediment off this project,” (since building the terrace and revetment.) Yet the Army Corps assessments from 2005 and 2016 both claim the revetment is “inadequate”, is degrading, and mentions the “progressive instability” of the bluff. Both of these things can’t be true. Is it the ACE contention that the professional responsible for managing erosion at the lighthouse at least since the 1990s is wrong?

\* Surfing Resources Not Protected – Three surfing areas could potentially be impacted by the project and nothing in the HSLRR nor in the original 2005 Study provides definitive evidence to the contrary. The economic importance of surfing in this area has gone up dramatically since the 2005 study. In 2006, 2007 and 2008, the surfing community fought the prohibition on surfing around the Lighthouse. We won when a judge declared that there is no rule prohibiting surfing around the Lighthouse. Still, insultingly, signs persist saying no surfing is allowed. Furthermore a Surfing Museum has opened at the Montauk Lighthouse complex underscoring the importance of surfing in this community. Therefore the surfing resources need to be evaluated as thoroughly as biological resources are for a project like this.

\* Protect the structure not the bluff – The Hurricane Sandy LRR talks about protecting the bluff (p. i). While it is obvious that the lighthouse is on the bluff, the bluff would not need protecting if the lighthouse was moved. The main goal of the Corps should be providing the lighthouse complex with safe, long-term protection. The most long-lasting solution is moving the lighthouse. The bluff provides important ecological services to down-drift beaches. The Army Corps’ mind set of protecting a structure and the land it stands on from sea level rise is limiting and dangerous. The best protection comes from moving structures out of harm’s way.



\* Moving Not Explored - The option of moving the Lighthouse was not revisited in the HSLRR. The Feasibility Study from 2005 said moving the Lighthouse would cost \$27 Million (p.44) but there was no discussion of the future savings by not having to build, re-build, and maintain the rock revetment for hundreds of years. The whole purpose of the post-Sandy Reevaluation was to consider the increased risk from Sea Level Rise, and to evaluate the project for “long term sustainability” (p. 25). Clearly moving the lighthouse would be a longer-term and more sustainable solution than yet another rock revetment.

\* Expend Scarce Financial Resources Wisely & Where There is Real Need – Millions of citizens are still suffering during the re-building following Hurricane Sandy & other natural disasters. Scarce financial resources should be spent to help these citizens recuperate rather than to construct a seawall where it is not indicated. In a federal budget of limited resources, this \$18 Million could be better spent elsewhere in places that actually need help.

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\* Long Term Sustainability - The preferred alternative in the HSLRR does not meet the Corps own standard of Long Term Sustainability, (p. 26). Each rock revetment at the Lighthouse has not lasted as long as expected. This rock revetment is given a possible life span of 73 years. There is no doubt that moving the Lighthouse would protect it from naturally occurring erosion for hundreds of years. A longer-lasting solution is by definition more sustainable for the long-term

\* Poor Public Process – Congress and the ACE have indicated that the Hurricane Sandy disaster was a significant event & response to it to requires a reevaluation. We agree. Consequently, the public should have to opportunity to be heard regarding this project. There should be a longer public comment period, as well as public hearings in the community. There was no notice in the local papers about this project until June 2, the day prior to the deadline for comment. The HSLRR stresses the importance of the Lighthouse complex to this community. ACE should therefore allow more time and a meaningful forum for people to digest, understand, and question the hundreds of new pages produced by this HSLRR and its appendices.

Thank you for considering my comments.

Regards.  
Jay Levine

[REDACTED]

Jay Levine

[REDACTED]

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I strongly oppose the Army Corps new project of placing boulders at the Montauk Lighthouse. I see no evidence of the benefits of this project. The project will have a HUGE negative effect on the fishing and surfing community as well. I urge you to seek other solutions, as we all know the lighthouse is not falling into the sea anytime soon. Thank you. respectfully,

brian walsh

[REDACTED]

---

Good afternoon,

I would like to say that I disapprove of the plan to reinforce the lighthouse. The use of a hard structure would cause more issues with erosion down the coast, disrupting the surf which is good for business, and costing the community way too much to build. I think this plan is economically and ecologically irresponsible and I am against it wholeheartedly.

Best,

[REDACTED]

---

Regards. As a Sag Harbor environmental lawyer who has been active in helping to protect Lake Montauk with several current clients on East Lake Drive, I am very concerned about the "indirect" impacts of this proposed Lighthouse project.

In particular, I understand that your current plan is to land the huge boulders required at a transit site near the end of East Lake Drive, and then haul them by truck out to the lighthouse.

This raises several serious questions about the potential community and environmental impacts of this plan, in terms of concerns like air pollution, noise, traffic safety, congestion, and road damage.

>> Is it true that this EL route is , your current transportation planned route for the boulders? Have you evaluated alternative landing sites and routes?

-- What specific transit site do you plan to use?  
Is it currently zoned as a truck transit site?

-- Do you plan to get the necessary zoning and work permits, including any required environmental impact statements?

-- What is the scale of planned boulder offloading and transportation, in terms of the number of boulders, the estimated number of heavy truck runs, how you plan to get the boulders to Montauk and the overall timeline for completion of this boulder transportation effort?

My clients and I look forward to working with you to make sure this project makes overall environmental sense, while minimizing collateral damage to the community.

Thanks for your prompt response.

Sincerely yours,  
James S. Henry, Esq.  
Sag Harbor Group

[REDACTED]

[REDACTED]  
Skype: [REDACTED]  
Twitter: [REDACTED]

Senior Fellow, Columbia U. Center  
On Sustainable Investment  
(Blocked<http://ccsi.columbia.edu> <Blocked<http://ccsi.columbia.edu/>>  
Global Justice Fellow, Yale U.  
Senior Advisor, TJN  
Member, NY Bar  
Coop Att., ACLU/NYCL

[REDACTED]

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Dear Robert -

The lighthouse in Montauk is a strong community force in Montauk - a place for fisherman and surfers. Armoring the beach around the light house would destroy the surf breaks out there. The surf break ruined, the community would disappear and Montauk would suffer economically.

In addition, armoring has been outlawed under East Hampton's Local Waterfront Revitalization Plan, LWRP, based on the understanding that armoring on beaches causes them to disappear.

Armoring the lighthouse will have irreversible consequences on the community.

If the safety of the light house is a concern, then your dollars would be better spent construction a lighthouse in a safer zone.

Many thanks for you attention to this matter,

Anna Marrian  


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Dear Mr. Smith,

As a coastal scientist it's my normal practice to put forth a well-founded scientific position addressing coastal projects. However, in recognition of the fact that USACE consideration of public comments is a merely pro-forma exercise with little effect on the outcome, I'll cut to the chase.

1. The project is unnecessary. The existing revetment configuration is doing what it is intended to do, stabilize the project shoreline.
2. The expanded revetment will result in additional and more pronounced end scour adversely effecting the adjacent shoreline. The impact will necessitate the placement of additional structure at the ends. Recreation use of this area will be adversely effected.
3. More significant wave refraction will adversely impact a renowned surf break.

Lastly, it's a colossal waste of tax dollars and a purely boondoggle project. The Corps needs to get out of the business of being in business.

In the interest of responsible coastal management, the informed people of Montauk and the region request that the USACE cease and desist.

Respectfully yours,  
Kevin McAllister  
founding president



[Blockedwww.DefendH2O.org](http://www.DefendH2O.org) <Blocked<http://www.DefendH2O.org>>

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To: Robert Smith, Project Biologist  
U.S. Army Corps of Engineers, New York District  
Attn: CENAN-PL-E

Robert.j.smith@usace.army.mil  
Dear Mr. Smith,

I'm writing to you as a resident who is extremely concerned about the revetment being planned for Montauk Lighthouse.

I think the re-revetment is absolutely the wrong choice. I believe the only common-sense solution here is "retreat."

Also, I am aware that this project has been in the pipeline for a very long time, but these final stages of approval are moving too quickly. The rush from the release of the revised proposal to the closing of the public-comment period amounts to subterfuge. Obviously, the Army Corps of Engineers is aware of public opposition to shore-hardening in Montauk.

The public should be allowed to speak directly to the Army Corps of Engineers at public meetings before the matter moves any further.

East Hampton has a 370-year-old tradition of safeguarding our shoreline for public use. Our beaches and coastline are ours, they belong to us, they are our public commons. The vast majority of townspeople do not support the role of the Army Corps of Engineers in strong-arming the town to comply with its Fire Island to Montauk Point project. We believe decision-making on these matters must be returned to we the people, the residents.

Finally, shore-armoring plans in general have been proven to have a domino effect, both physically — causing erosion elsewhere in the vicinity — and legally (inspiring home owners to sue for the right to construct similar revetments on private property). Millions and millions of our Federal tax dollars have already been wasted on doomed attempts to alter the natural flow of sand and sea, and we demand that this latest debacle be halted before it begins.

Sincerely,  
Keri Lamparter

[REDACTED]

---

Sandy hardly effected Montauk Point and the Lighthouse. That Hurricane destroyed the west end of the island: Long Beach, the Rockaways, Breezy Point, Staten Island, etc... This is where Sandy funds should be spent. These areas still need help. Houses need to be lifted, the bay side of the barrier islands are still at risk, some residents still have not been reimbursed for the work they did "out of pocket" to return to their homes.

Yes the Lighthouse is a Historic landmark, but who lives there?

Spend the money on the people.

More study, and more consultation with all user groups needs to be done.

Thank you



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Dear Sirs:

I write to express my opposition to the proposed revetments at the Montauk lighthouse site. 17 years ago, the Cape Hatteras lighthouse was loaded on a NASA rocket trailer and moved a mile to protect the structure from erosion. I have just watched entire neighborhoods get jacked up 6 feet. The lighthouse should be moved as there is no way to stop the ocean. The recent work at Atlantic Terrace will bear this out over time. Is there even one successful erosion control project on the East Coast involving hard structures? I've never encountered one. Let's stop ruining things and creating unintended consequences and start making smart choices, move the structure!

William J. Graham



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Dear Robert, I am a concerned citizen and surfer/fisherman from Montauk, NY. The proposal by the Army Corp of Engineers should be taken off the table and re-evaluated. There is too much at stake to spend this Federal \$\$\$ just because it is available. I've highlighted Surfrider's position on this matter and I agree. I could understand not wanting to move the Lighthouse, as it is so spectacular in its current location, but the current revetment which is both natural and hard (stone) is working great. Extending it out will only increase erosion down drift, as in Turtle Cove and points west.

Thank you for listening...Michael & Michelle Avallone, Montauk, NY

Surfing Resources Not Protected – Three surfing areas could potentially be impacted by the project and nothing in the HSLRR nor in the original 2005 Study provides definitive evidence to the contrary. The importance of surfing in this area has gone up dramatically since the 2005 study. In 2006, 2007 and 2008, the surfing community fought the prohibition on surfing around the Lighthouse. We won when a judge declared that there is no rule prohibiting surfing around the Lighthouse. Still, insultingly, signs persist saying no surfing is allowed. Furthermore a Surfing Museum has opened at the Montauk Lighthouse complex underscoring the importance of surfing in this community. Therefore the surfing resources need to be evaluated as thoroughly as biological resources are for a project like this.

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to erosion. This project is contrary to what a democratically elected governing body passed with community support. While East Hampton may not have jurisdiction over the Lighthouse, the Lighthouse is in East Hampton, and the town has already declared that armoring is not the right response to erosion.

\* Protect the structure not the bluff – The Hurricane Sandy LRR talks about protecting the bluff (p. i). While it is obvious that the lighthouse is on the bluff, the bluff would not need protecting if the lighthouse was moved. The main goal of the Corps should be providing the lighthouse complex with safe, long-term protection. The most long-lasting solution is moving the lighthouse. The bluff provides important ecological services to down-drift beaches. The Army Corps' mindset of protecting a structure and the land it stands on from sea level rise is limiting and dangerous. The best protection comes from moving structures out of harms way.

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\* Cost – The revised proposal will cost \$18.2 million (p. iii) but the original estimate from 2005 was for \$14.6 million (p. i) On page 8 of the HSLRR the original design was characterized as "difficult" because excavation 16 feet below mean low water was required. It mentions the "de-watering" which would "complicate" not to mention removing 32,000 cubic yards of material. The new design only excavates 2-3 feet below mean low water with removal of 4200 cubic yards of material. Also, less armor stone is called for in the current design. All this should add up to reduced cost, but somehow the cost is coming in millions higher than before.

\* Economic Benefits Overstated – An economic assessment of the alternative of doing nothing makes the erroneous conclusion that the revetment would fail (immediately) and there would be no more lighthouse, museum or complex to attract people to the area. This is absurd. The lighthouse will stand for decades with or without a new rock revetment. The lighthouse complex will have visitors and people paying for parking for decades without this project. Therefore the economic analysis of doing nothing is flawed. In a federal budget of

limited resources, this \$18 Million could be better spent elsewhere in places that actually need protecting.

\* Surfing Access – It is mentioned that during construction, fishing and surfing will be allowed on the beach next to the lighthouse, (p. 12). But only fishing organizations are mentioned as groups that will be consulted. Surfing groups like the Surfrider Foundation need to be reached out to regarding access during and after construction as equals with fishing organizations.

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\* Poor Public Process – Congress and the Army corps thought Hurricane Sandy was a significant enough event to require a reevaluation. We agree. But the public should therefore have to opportunity to be heard in light of information gained form Hurricane Sandy. There should be a longer public comment period, as well as public hearings in the community. There was no notice in the local papers about this project (?). The HSLRR stresses the importance of the Lighthouse complex to this community. They should therefore allow more time and a meaningful forum for people to digest, understand, and question the hundreds of new pages produced by this HSLRR and its appendices.

Michael Avallone | Inflation Derivatives

ICAP CAPITAL MARKETS LLC | Phone: [REDACTED] |

[REDACTED]

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To: Robert Smith, Project Biologist  
U.S. Army Corps of Engineers, New York District  
Attn: CENAN-PL-E

Robert.j.smith@usace.army.mil

Dear Mr. Smith,

I'm writing to you as a resident who is extremely concerned about the revetment being planned for Montauk Lighthouse.

I think the re-revetment is absolutely the wrong choice. I believe the only common-sense solution here is "retreat."

Also, I am aware that this project has been in the pipeline for a very long time, but these final stages of approval are moving too quickly. The rush from the release of the revised proposal to the closing of the public-comment period amounts to subterfuge. Obviously, the Army Corps of Engineers is aware of public opposition to shore-hardening in Montauk.

The public should be allowed to speak directly to the Army Corps of Engineers at public meetings before the matter moves any further.

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Lisa Spellman  
Resident



Dear Robert,

I am an East Hampton Town resident of over 25 years and have witnessed the changes made to our coastline over time. In light of hearing about the Army Corps plans to increase the rock wall in front of the Lighthouse, I have to speak up.

Creating a further barrier in front of the lighthouse in order to deplete the funds left over from Hurricane Sandy is yet another 'quick fix' solution and one that causes more problems moving in to the future. It will permanently alter the coastline off the Point, destroy some of the most idyllic coves & surf breaks we have AND directly come into conflict with East Hampton's commitment to not armor our beautiful coastline. The cost & procedure for moving the lighthouse has never been fully explored and/or shared w the public. In fact, many of these proceeding including this one, have neglected to involve the public's comments in an appropriate manner. Longer terms for those who live & breathe here to SPEAK and OFFER ALTERNATIVES has become a secondary issue and I, for one, am horrified by the Army Corps didactic ways in pushing through agendas that go against public opinion.

Your plan is faulty and requires further research and discussion w the people who care about it most, East Hampton residents. Do not destroy yet another landmark beach in order to push through an agenda that with proper care and consideration could be a win-win for the town & Army Corps alike.

Thank you for your attention to this highly sensitive matter.

Sincerely,  
Evelyn O'Doherty



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To whom it may concern,

As President of the East Lake Association, an association of over 100 families who reside along East Lake Drive in Montauk, I would like to register our concerns with respect to the proposed Lighthouse project.

We are concerned about the transportation of the boulders for the project along East Lake Drive as it has come to our attention that the preliminary plan is to import them into Lake Montauk Harbor via barge and offload them onto trucks at the northern terminus of the roadway. From there these boulders would be trucked southward on East Lake Drive past hundreds of residences to Rt. 27 east.

East Lake Drive is approximately 3 miles long, it is narrow and winding with many blind curves and blind driveways. The roadbed is fragile and is not able to withstand such heavy usage. We strongly object to any proposal of heavy traffic through our neighborhood for this project.

If necessary we intend to pursue Judicial relief to prevent the disruption of our environment as well as the severe safety risk this would pose to everyone who lives in the area as well as those who use East Lake Drive.

We certainly hope that consideration will be given to our concerns.

Yours truly,  
Harry J. Ellis, Pres.  
c.c. James S. Henry, Esq.

[REDACTED]

Dear Mr. Smith:

The Town Of East Hampton passed a Local Waterfront Revitalization Plan, which, based on sound science, declared that hardening the shoreline of East Hampton was not an acceptable solution to the natural erosion of land due to ocean processes. It is therefore illegal, as well as foolish, to put millions of dollars into a project to protect the Montauk Lighthouse with more rocks.

I urge you to do whatever is in your power to prevent the ACoE from undertaking this wasteful and ill-considered action.

Sincerely,

Janet Van Sickle

[REDACTED]

Robert,

Please consider all alternatives in order to preserve surfing and fishing in the area.

We are homeowners in Montauk and have shared a decades of enjoying the natural beauty and waves.

Thank you  
Rick J Brickell  
SVP

[REDACTED]

Robert,

We all know that the lighthouse doesn't need this project for many reasons. The main reason being there is no evidence of erosion since the last project/terracing was done on that bluff. Hard structures are outlawed by local government and increase erosion. The rock there is holding up just fine and the best option is to move this historic landmark to keep her safe for another 200 years. 50+ feet more of boulders jutting out will for sure wash out what sand is left in turtle cove. This Sandy money is better off helping out another community.

Sincerely,  
Kurt Fuch Secretary Surfrider Foundation Eastern Long Island Chapter

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Hi Robert. This plan needs more time, detail, consideration and public input. Please extend the public comment period, hold additional town halls and evaluate all alternatives prior to this, in my opinion, detrimental decision.

Ryan J. O'Shea | Sales Executive | National Accounts Group  
Intercontinental Exchange | Interactive Data

office |

mobile |

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Dear Mr. Smith

I am a resident of East Hampton, NY and I am opposed to the ACE Montauk Light bluff project for many reasons among those reasons are:

It is in violation of East Hampton Town's East Hampton's Local Waterfront Revitalization Plan

There is poor public process, I just found out about this 1 day before the comment period ends.

I don't believe the project has long term sustainability.

Ecological damage to the down drift areas and surfing areas.

Sincerely,  
Stephen Mahoney

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Dear Mr. Smith, I believe that the revetment proposal is based on misperceptions and short-sightedness. The underlying premise seems to be to protect the lighthouse as is, no matter the impact on other aspects of the local environment. Alas, the armoring can only scour the beaches nearby and destroy wave patterns that have created the surfing repute of the area. Moreover, the alternative of moving the lighthouse does not seem to be given any serious attention. That. Certainly would cost a lot less in the long run, and is as well as more feasible in light of global climate change and the concomitant rise of sea levels worldwide. I strongly oppose the revetment proposal and urge further study of the alternative.

Tom Oleszczuk

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Dear Mr. Smith,

I am writing you to offer my opinion on the USACOE planned project to rebuild the Montauk Point Rock Revetment. Firstly, I'd like to ask your organization to give the public more time to consider the proposal before you make a decision. I was made aware of this public comment period only last week and the Re-evaluation Report and its appendices contain hundreds of new pages that community groups and the public need more time to digest, understand and craft thoughtful questions and concerns. I think it would also be appropriate to have more notice of this public process in the paper and a public hearing in the affected community.

In case you aren't able to extend the public comment period, here are some concerns I have with the project as proposed. It doesn't seem like the current revetment is in any imminent danger, or even failing at all. In a recent video on PBS Television's NOVA program [Blockedhttp://www.pbs.org/video/2365746001/](http://www.pbs.org/video/2365746001/) a man who has worked on the terracing of the bluff claims that, "We have not lost a wheelbarrow full of sediment off this project," (since building the terrace and revetment.)

It seems like it would be a waste of money to spend Sandy recovery funds to rebuild a structure that wasn't even affected by the storm. The re-evaluation report also doesn't explore the option of moving the lighthouse back from the bluff if it indeed is in peril of falling into the ocean. The Feasibility Study from 2005 said moving the Lighthouse would cost \$27 Million (p.44) but there was no discussion of the future savings by not having to build, re-build, and maintain the rock revetment for hundreds of years. The whole purpose of the post-Sandy Reevaluation was to consider the increased risk from Sea Level Rise, and to evaluate the project for "long term sustainability" (p. 25). Clearly moving the lighthouse would be a longer-term and more sustainable solution than yet another rock revetment.

Making the current structure bigger would also have harmful impacts on the down-drift beaches, further exacerbating erosion in Turtle Cove and cutting off the supply of sand that feeds LI beaches, including downtown Montauk where the ACOE just finished laying down tens of thousands of geo-textile bags to save a row of oceanfront hotels. The proposed project to further harden Montauk Point just doesn't make sense in the context of all the other efforts being made to save LI's coastline. The best solution to saving both ocean front structures and public beaches from erosion and sea level rise is to move structures back from the ocean.

There are 5 lighthouses in the Northeast U.S. with very similar geography and geology to Montauk. If it can be done in these locations, it can be done in Montauk. It is not impossible and it doesn't need to cost more than throwing more rocks down if your agency considers the lifetime benefits of such a project. I urge you to compare the projected costs to move the Montauk lighthouse and make a thorough comparison with the methods and circumstances used to move these other lighthouses:

Highland Light, Cape Cod  
Nauset Light, Cape Cod  
Sankaty Head Lighthouse, Nantucket  
Gay Head Lighthouse Martha's Vineyard  
Southeast Light, Block Island

Managed retreat, or moving structures out of harms way, is the best and only real permanent solution for coastal erosion and sea level rise. I do not support the proposed project to place down larger stones and to make the revetment at Montauk Point any bigger.

Thank you for considering my concerns.

Mara Dias

[REDACTED]

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You should include a plan to nourish downdrift beaches with sand dredged from offshore to mitigate the effects of protecting the lighthouse.

Bill Taylor

[REDACTED]

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No to changes at montauk, shame for other projects such as low interest loans for millionaires in Westhampton beach after Halloween storm. Montauk was created by God for us. Stop meddling

[REDACTED]

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Dear Mr. Smith,

I am writing to you about this project because I surf at Montauk. There are 3 amazing surf breaks at the point and when it breaks it is so beautiful to be in the rawness of the sea. I understand that the light house must be preserved too, but there should be a way to preserve it and keep the natural bottom of the ocean so surfers can surf.

Here is a link from Surfrider to back up our argument. Please reconsider this project.

Blocked <https://easternli.surfrider.org/talking-points-for-comments-on-lighthouse-revetment/>

Thanks for your consideration,

Kim Kuznitz

[REDACTED]

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Dear Robert J smith,

I am concerned about the long term consequences of the investment in and repair/ building of hard structure and armoring of the bluff around the Montauk Lighthouse. I would prefer a longer term investment in the moving of the Lighthouse away from the naturally eroding bluff.

Thank you for consideration in this matter,  
Derrick Galen

[REDACTED]

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Dear Mr. Smith:

I'm writing to you as a resident who is extremely concerned about the revetment being planned for Montauk Lighthouse.

I think the re-revetment is absolutely the wrong choice. I believe the only common-sense solution here is "retreat."

Also, I am aware that this project has been in the pipeline for a very long time, but these final stages of approval are moving too quickly. The rush from the release of the revised proposal to the closing of the public-comment period amounts to subterfuge. Obviously, the Army Corps of Engineers is aware of public opposition to shore-hardening in Montauk.

The public should be allowed to speak directly to the Army Corps of Engineers at public meetings before the matter moves any further.

East Hampton has a 370-year-old tradition of safeguarding our shoreline for public use. Our beaches and coastline are ours, they belong to us, they are our public commons. The vast majority of townspeople do not support the role of the Army Corps of Engineers in strong-arming the town to comply with its Fire Island to Montauk Point project. We believe decision-making on these matters must be returned to we, the residents.

Finally, shore-armoring plans in general have been proven to have a domino effect, both physically — causing erosion elsewhere in the vicinity — and legally (inspiring home owners to sue for the right to construct similar revetments on private property). Millions and millions of our Federal tax dollars have already been wasted on doomed attempts to alter the natural flow of sand and sea, and we demand that this latest debacle be halted before it begins.

Sincerely,  
Concerned Citizen  
Sandra Nordholm  
Cell: [REDACTED]

[REDACTED]

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From: Bess Rattray |  
[REDACTED]

Dear Mr. Smith,

I'm writing to you as a resident of East Hampton Town, who is extremely concerned about the revetment being planned for Montauk Lighthouse.

I think the re-revetment is absolutely the wrong choice. I believe the only common-sense solution here is "retreat."

Also, I am aware that this project has been in the pipeline for a very long time, but these final stages of approval are moving too quickly. The rush from the release of the revised proposal to the closing of the public-comment period amounts to subterfuge. Obviously, the Army Corps of Engineers is aware of public opposition to shore-hardening in Montauk.

The public should be allowed to speak directly to the Army Corps of Engineers at public meetings before the matter moves any further.

East Hampton has a 320-year-old tradition of safeguarding our shoreline for public use. Our beaches and coastline are ours, they belong to us, they are our public commons. The vast majority of townspeople do not support the strong-arm role of the Army Corps of Engineers in forcing the town to comply with its Fire Island to Montauk Point project. We believe decision-making on these matters must be returned to we, the residents.

Finally, shore-armoring plans like these have been proven to have a domino effect, both physically — causing erosion elsewhere in the vicinity — and legally (inspiring home owners to sue for the right to construct similar revetments on private property). Millions and millions of our Federal tax dollars have already been wasted on doomed attempts to alter the natural flow of sand and sea, and we demand that this latest debacle be halted before it begins.

Sincerely,  
Bess Rattray  
[REDACTED]

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Mr Smith


I am writing to oppose the MontUk lighthouse revetments project . As a taxpayer wishing to see our taxes spent wisely. . Surfing will adversely be affected

Also your proposal is against east Hamptons town code against hard structures.

Retreat is the only option.



Thank you  
Stacey Brosnan



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Just received word regarding the Corps' latest proposal at Montauk Point. With limited time (that of the Corps requiring comments by tomorrow, and my own given other obligations tonight and the next few days out of state, I'm providing relatively brief comments while away from a desk and preparing for an out of state trip. Please bear with these comments as they are being prepared on a smart phone while I'm "on the road".

The continued armoring of Montauk Point is inappropriate. It was inappropriate the first time, it was inappropriate during subsequent projects at the point and adjacent to it, it is inappropriate this time, and will always be inappropriate.

Bluff erosion is not a hazard. Bluff erosion is necessary for continued nourishment and functions of NYS designated natural protective features at, adjacent to, and elsewhere. The hazard is storm driven Atlantic Ocean waves and flooding. The lighthouse is not now in danger from coastal hazards nor would it be in danger in the reasonably foreseeable future if it were moved landward as it should have been moved decades ago.

While an argument has been made in the past that that moving the lighthouse and associated structures landward would impair the historic context of the lighthouse in its original location, that is not a determinant factor. Determinant factors are all of the relevant policies of the State of New York's federally approved coastal management program (CMP) and the CMP as it has been amended by the Town of East Hampton's Local Waterfront Revitalization Program.

The policies of the CMP and the LWRP advance national coastal objectives of the federal Coastal Zone Management Act and are required to be adhered to as elements of a federal agency's planning, design, budgeting and directly undertaken activities. In this instance the Corps' project is required to be consistent to the maximum extent practicable (note the standard is "practicable, not "practical" - see CZMA implementing regulations in 15 CFR 930 for the relevant standard, which does not allow for economic costs as an excuse for avoiding full consistency with all relevant enforceable policies of the CMP). CMP and LWRP policies require the use of nonstructural measures, which include relocating preexisting development out of and away from coastal erosion hazard/natural protective feature areas, whenever such nonstructural measures are possible. Such nonstructural measures are available for the lighthouse at Montauk Point State Park. In such instances structural measures such as those used by the Corps in the past are not to be used. They should be phased out and discontinued in such instances.

Moving the lighthouse and associated facilities a sufficient distance landward would cost less economically, socially, and environmentally for hundreds of years. That appropriate alternative would thereby advance rather than conflict and be inconsistent with NYSCMP

policies relating to flooding and erosion hazards and the protection of human life and property by protecting natural protective features, their important physical functions, and the protection they provide to areas and human life and properties landward of them. It would advance policies relating to protection and continued public enjoyment of historic resources and other important public recreational and other uses of beaches at, adjacent to, and considerable distances from the easternmost part of Montauk Point. It would advance policies relating to appropriate types and levels of development and public uses of publicly owned properties and policies discouraging inappropriate development and uses in inappropriate areas, including policies having a clear intent to move or phase out of coastal hazard/natural protective feature areas preexisting development, rather than expending great sums in public and in certain circumstances private funding to maintain development in such areas. It would simply cost less over the long term in many venues to move the lighthouse out of harm's way.

The lighthouse itself is no longer used for navigational safety as it was historically used, as more technologically advanced radio and satellite beacons and more accurate and reliable GPS is used, evidenced by the more modern facility adjacent to the historic lighthouse. Moving it landward rather than keeping it at the edge of the bluff at Montauk Point is not required.

As federal and programmatic CMP consistency standards require that Corps and other federal agency activities be consistent to the maximum extent practicable with all relevant CMP policies, and the advancement of achievement of any one of more policies to the detriment of another or others is not provided for (thereby achieving multiple national and State objectives rather than single purpose objectives), moving the lighthouse and associated facilities landward is the appropriate option. That option meets the Corps' relevant "federal standard", which, as a federal requirement, is to include federal CZMA and CMP consistency standards.

The common sense and most appropriate and least costly option over the long term, having fewest adverse effects on the environment, in this instance, which would comport with rather than be inconsistent with and undermine several relevant national and NYS coastal objectives, would be to move the lighthouse. That has been done elsewhere in similar circumstances where it was more difficult than at Montauk. It should be done here.

Steven C. Resler

[REDACTED]



Hi Robert,

I am writing to express my concerns about the proposed project. While I support efforts to preserve the lighthouse there some areas of immediate concern I have. It concerns access to point and two the beaches to the north and south.

One: it is imperative that access to the current point is preserved for fisherman and hikers. Surfcasting is a immensely popular activity in Montauk and removing a favorite fishing spot for almost two years will surely impact tourism to the town and area.

Two: Figure 6 details two temporary work areas that will be needed for the project. These areas take up the entire beach on the north and south sides of the point. Again these are popular fishing and hiking grounds and access needs to be preserved for those who have been responsibly enjoying these areas in the past. Additionally, on both beaches provide surfing access to some of the best waves on long island and the entire the east coast. While i recognize that staging areas for equipment are required the Army Corp needs to find a way to balance the needs of current stakeholders by preserving beach access during the project.

I hope you find these reasonable and can consider that many in the area are particularly sensitive to Army Corp projects after the recent dune project downtown and the current issues plaguing it.

Thanks,

Chris Schade

[REDACTED]

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Dear Mr. Smith--

I'm concerned about your plans to make a larger revetment around the Montauk Lighthouse. Wouldn't it be cheaper in the long term to pay upfront and move the lighthouse instead of doing larger reventments every few decades? They moved the Cape Hatteras lighthouse for about 12 million dollars in 1999. Isn't there a risk of this circle shaped revetment turning the lighthouse area into an island?

There was very limited public involvement in an expensive project that will affect a very popular fishing and surfing area--that's not how it's supposed to work. Please go back to the drawing board and let the community that uses this area have their say.

Matt Gove

[REDACTED]

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nothing more needs to be done at the lighthouse. nothing has changed at all since the revetment was installed. total waste of time and money.....not to mention the destruction of three great surf spots. this place is quite dear to the montauk community.

please don't ruin it!

randall rosenthal

[REDACTED]

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In my opinion the lighthouse is a white elephant that costs the local tax payers many many thousands of dollars for nothing. Its not needed for navigation and spending more money on this project is a complete waste of taxpayers money.

chip duyck

[REDACTED]

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June, 3, 2016

Attention

Project Manager Frank Verga: Frank.Verga@usace.army.mil


Dear Frank Verga,

I am writing to express my concern over the Army Corps of Engineer's proposed Montauk Lighthouse Revetment Project. I have lived in Montauk for the last twenty years and I want to urge you to cancel with project. I am a working landscape photographer/filmmaker and over the years as I have been photographing the lighthouse and the surrounding revetment I can assert that there has not been any damage to existing revetment and lighthouse is safe.

The project has not considered moving the lighthouse as a long term solution. East Hampton costal legislation outlaws hard structures in response to erosion control. It sets a bad president to the town to build up the revetment even more. It's a huge cost that will negatively effect the many of the waves by the lighthouse. The surf zones around the lighthouse are some of the most important on Long Island, and the entire East Cost. This massive new project will destroy these waves. Last year the Montauk Surf Museum and Montauk Oceans Institute opened at the lighthouse solidifying how important the surf as a natural element is to the lighthouse. I urge you to do everything you can to stop the revetment project.

Thank you,

-Nate Best



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Dear Mr. Smith:

I am writing to comment on the ACE proposal to re-armour Montauk Point.

I feel very strongly the project as proposed will be detrimental to the surrounding environment and to the safety of recreational fishermen, watermen and surfers.

It is also unnecessary and risky for structural reasons. Claims that the current structure is failing or will fail are false. We have all seen the much distributed video where the man who built the structure publicly claimed that "not a wheelbarrow's worth of sand has been lost. Myself and many other members of our community agree with him 100%.

A larger structure with the toe extending 40' seaward of the shoreline will have negative and dangerous effects for those who recreate in that area, including fisherman, surfers, campers, kayakers and other boaters. There will also be enhanced wave hacking as a result of the revetment to surrounding shores which could be substantially more devastating and increase instability in areas that are otherwise currently stable. Research shows that there are 5 lighthouses in the Northeast U.S. with very similar geography and geology to Montauk. All of these lighthouses faced the same roadblocks as Montauk has around expense, the grade or that the project is perceived as impossible. Each of these projects was successful and the same thing could be done in Montauk which much longer lasting results.

Here is the list:

Highland Light, Truro. Cape Cod

Nauset Light, Cape Cod

Sankaty Head Lighthouse, Nantucket

Gay Head Lighthouse Martha's Vineyard

Southeast Light, Block Island

Hatteras Light is also a huge structure that was moved, albeit on level ground.

Moving the lighthouse is a viable solution we need to consider before embarking on such a misinformed project to dump rocks needlessly into the area and at an extreme price.

Furthermore, the Army Corps of Engineers does not want a public failure on its hands when this project is indeed perceived as wasteful, faulty and unnecessary. Please consider these comments before proceeding and lets discuss alternatives. Thank you in advance for your time-

Nicole

FONDGroup.com

NICOLE DELMA, FOUNDER



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Dear Mr. Smith,

I am writing to suggest that we do what is best for posterity - the best for our children, grandchildren, great-grandchildren and for Montauk, and take to heart the words of the scientists who have already weighed in on the dangers and damages (including accelerating erosion) of revetments. . . . and ask that you consider moving the lighthouse back. This was done already very successfully but the situation of climate change and rising waters has forced us to once again make a very bold and sizeable investment in our future. The Lighthouse is very important and to do this would be a legacy of great value to those in the future. A truly honorable stand to make. Thank you.

Peace,

Heidi Rain Oleszczuk



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