October 3, 2025

Ms. Sophie Killy
U.S. Army Corps of Engineers, New York District
Planning Division, 17th Floor – Environmental Branch
26 Federal Plaza, New York, New York 10278-0090
Email: Sophie.r.killy@usace.army.mil

RE: Draft Supplemental Environmental Assessment for the Fire Island to Montauk Point, New York, Coastal Storm Risk Management Nonstructural Pilot Program

On behalf of our over three million members and supporters, Environmental Defense Fund (EDF) appreciates the opportunity to provide comments for the Draft Supplemental Environmental Assessment for the Fire Island to Montauk Point, New York, Coastal Storm Risk Management Nonstructural Pilot Program (FMIP).

EDF is a leading international, non-partisan, nonprofit organization dedicated to protecting human health and the environment by effectively applying science, economics, law, and innovative private-sector partnerships. With more than 250,000 members and activists in New York State and 3.5 million members nationally and internationally, EDF's experts are working to turn our solutions into action.

As environmental advocates with direct experience in building coastal resilience by advancing nature-based solutions, equitable flood risk management and science-driven policies, we are pleased to provide comments on this Draft Supplemental Environmental Assessment.

We are eager to share a report that was finalized in June of 2025 which EDF (as a part of the Restore the Mississippi River Delta coalition, which is comprised of EDF, National Wildlife Federation, National Audubon Society, and Pontchartrain Conservancy) contracted with local organizations (UNO-CHART and Fenstermaker) to perform a social science research project that aimed to evaluate community perceptions and challenges to nonstructural opportunities as well as perceptions to the U.S. Army Corps of Engineers (USACE) Southwest Coastal Louisiana (SW Coastal) project. This effort is one of the largest nonstructural projects to date. With approximately 3,900 structures eligible for elevation, SW Coastal provides critical lessons on homeowner engagement, perceptions of risk reduction, and challenges to implementation.

Our study aims to elevate existing community engagement and offer recommendations for improved outreach and engagement to bolster the success of this USACE project and future nonstructural projects across the U.S. We think lessons learned from speaking directly with

residents eligible for SW Coastal, as well as the analysis of those interviews, can reveal actionable insights for other large-scale USACE nonstructural projects like the FMIP. While the New York context differs from Louisiana, FMIP will likely face similar challenges. Therefore we recommend that USACE:

EDF Comment 1

- Invest in dedicated outreach staff or partner with trusted local organizations to conduct engagement.
- Develop plain language, culturally appropriate outreach materials that address homeowner concerns directly.
- Provide clear and transparent timelines, eligibility criteria, and funding expectations.
- Pilot innovative engagement approaches such as community liaisons, peer-to-peer homeowner networks, or neighborhood-level workshops.

Given the individualized nature of home ownership, nonstructural projects require a unique path to implementation—one that involves collaboration with a large cohort of private owners. Whether communities will embrace these opportunities is central to the success of the project. There is an enormous opportunity to bolster the success of nonstructural projects by continuing to improve outreach and engagement strategies. Outreach is a core project function—not an add-on. Successful community engagement on nonstructural projects requires strategic planning, skilled staffing, and disciplined execution. The goal should be to build trust and credibility with residents, ensuring voluntary measures are not only offered, but embraced.

EDF appreciates the USACE's leadership in advancing nonstructural measures and urges the agency to prioritize outreach and engagement as essential project functions. The time to consider these efforts is now not during construction.

Please feel free to reach out with any questions or further follow up on these comments and our attached report.

Respectfully,

Rachel Rhode
Manager, Climate Resilient Coasts & Watersheds
Environmental Defense Fund

Rachel Rhode

Allie Olsonoski
Project Manager, Climate Resilient Coasts & Watersheds
Environmental Defense Fund

Allie Olsonoski