

LONG BEACH ISLAND JOINT COUNCIL  
Of TAXPAYER ASSOCIATIONS

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North Beach Haven, NJ 08008

March 23, 2019

U.S. Army Corps of Engineers Planning Division  
Wanamaker Building  
100 Penn Square E.  
Philadelphia, PA 19107

To Whom It May Concern:

The Long Beach Island Joint Council of Taxpayer Associations (JCTA) is hereby submitting comments on the New Jersey Back Bays Coastal Storm Risk Management Study's Tentative Selective Plan (TSP).

Our concerns reflect the lack of transparency and information provided to the public while developing the TSP. This has had a deleterious effect on our ability to evaluate and comment on the Plan's impact on Long Beach Island (LBI). Specifically, the systemic failure to engage in meaningful dialogue with the public entirely negates the projected Community Opportunities as reported in the TSP. Furthermore, the plan will reflect the public's subsequent lack of understanding, as residents had difficulty finding information about the TSP even though the study reported that the TSP can be broken down into smaller regions .

Notice of the December 1, 2016 scoping meeting failed to reach the Long Beach Island public for a variety of reasons:

- a. Public notice was published in the local newspaper (The Press of Atlantic City) that only serves the lower portion of Long Beach Island.
- b. Public was given merely 9 days of notice prior to the December 1, 2016 meeting; both public notice and the meeting itself were held at a time when the vast majority of homeowners had already vacated Long Beach Island for the winter.
- c. The USACE abruptly changed the TSP release several times.
- d. JCTA sent a number of letters to the USACE and the non-federal sponsor, the N.J. Department of Environmental Protection (DEP) complaining of the initial and revised release date (all during the 2019

winter) of the TSP and requested a change of the date to the spring when it is more appropriate for public engagement. At that time, a request for a public meeting on Long Beach Island to discuss the TSP was made. Both the USACE and DEP disregarded these concerns and released the TSP on March 1, 2019.

Evidence that the inadequate and inappropriate timing obstructed the public's awareness of the project was found in a May 7, 2018 council meeting which found zero (0) members of the JCTA were not even minimally familiar with the NJBB study, nor had they received the outcome of the June 2016 Charrette meeting.

Subsequently, the only response to the JCTA's concerns was from the Commander of the USACE's Philadelphia District who provided the name, telephone and email address of the District's Chief of Planning. However, the Chief never responded to the JCTA's invitation to participate in an LBI public meeting to discuss the TSP and only responded to one of the 3 e-mails regarding questions on the study. Our contact with the Chief was terminated abruptly and without notification, and the DEP's Director of Coastal Engineering demanded that all requests regarding the study are only to be sent directly to the USACE.

A comprehensive public engagement initiative should have been included in the TSP to educate the public and gain their support. As a result of botched communications and interfacing between the TSP and the coastal communities it purports to serve, there will be lasting questions and mistrust in the USACE and NJ DEP's ability to adequately assess and address the significant environmental threats to Long Beach Island.

Respectfully yours,

Peter Trainor, MPH  
Chair, Environmental Committee