Good evening. My name is Mark Wildonger. I am planner for Scenic Hudson, Inc., a 47-year-old nonprofit environmental organization and separately incorporated land trust dedicated to protecting and enhancing the scenic, natural, historic, agricultural and recreational treasures of the Hudson River and its valley.

We applaud the efforts of the City and its residents for continuing the important task of completing a Local Waterfront Revitalization Program. This has been in the works for many years, and Scenic Hudson is pleased that the process is moving forward. Most importantly, the LWRP will express the City's vision that will guide how its waterfront areas can be utilized to achieve the complementary goals of recreational access, economic revitalization, ecological restoration and public health. And the LWRP also will become a valuable document for the City to use to help secure funding for waterfront amenities.

The draft LWRP contains multiple strategies intended to bring new vitality to the waterfront; we support many of them and we will comment on them in more detail separately. But tonight we would like to limit our remarks to South Bay. South Bay is an outstanding natural resource and has the potential to become a recreational, educational and economic resource for Hudson and the whole Hudson River Valley. And it is the City's key defining gateway feature as one enters the City from the south.

Policy 7B of the New York State Coastal Policies in the LWRP affirms the importance of this asset by recommending that the City should “Protect, Preserve and Restore the Locally significant South Bay so as to maintain its viability as habitat.”
Scenic Hudson supports the proposed zoning that would rezone the South Bay area from Industrial to a Recreational Conservation district. The purpose of the proposed district would be to conserve the unique and ecologically sensitive environments of the South Bay, including the locally designated fish and wildlife habitat in the South Bay.

In 2008, Scenic Hudson commissioned the scientific research organization Hudsonia Ltd. to conduct an ecological study to inventory the species and habitats in a portion of South Bay, including the path of the proposed route. The study found in South Bay, within the vicinity of the causeway, several state-listed rare plants and animals, other species of conservation concern, and habitats that could support other rare species. Though the report was not a comprehensive study of all of South Bay, it provides baseline information suggesting this proposed route has great biodiversity. Scenic Hudson recommends that City adopt the report’s recommendations for further study and include the report as an appendix to the LWRP.

Scenic Hudson strongly supports the City’s ultimate goal of getting the huge cement trucks off neighborhood streets because this will strongly improve daily life in the community. Through this open process and by listening to the residents, we believe that a new route can be identified that avoids residential neighborhoods without disrupting South Bay’s ecology. Scenic Hudson thinks that the City would agree that a healthy South Bay can contribute to the city’s economic revitalization.

While the LWRP acknowledges the importance of South Bay, it still identifies this area as the preferred spot for an intense transportation corridor that would accommodate one truck every three minutes – or approximately 80 roundtrips per day. However, such a proposed intense transportation corridor is an incompatible use due to the sensitive nature of the natural resources and the desire to use the Bay for possible recreational and educational opportunities.

Inexplicably, the LWRP suggests that trucks be routed along the causeway, but it recommends follow-up ecological studies be conducted only after the route has been constructed. At this point, with the causeway already subject to heavy industrial use, it would be too late to evaluate the impacts on South Bay and select either another alternative strategy altogether or implement measures that would adequately mitigate these impacts and further restore the Bay’s ecology. As an alternative, Scenic Hudson recommends that such studies should be the basis of the Generic Environmental Impact Statement and should help inform the selection of an appropriate transportation corridor.

Lastly, Scenic Hudson agrees with the LWRP recommendation for a local wetlands protection plan and wetland restoration in South Bay. The LWRP process is an ideal time for such a plan to be proposed and adopted.

**DGEIS**

Due to the magnitude of the decision to reroute a truck route, it is only appropriate that a hard look be conducted to consider all alternatives, including the preferred route. However, the DGEIS provides no such analysis. Scenic Hudson recommends that a more robust analysis be conducted to ensure all alternatives, including the preferred route, have been evaluated among the same criteria. We are particularly concerned that all of the costs of utilizing the causeway, including the cost to mitigate environmental impacts to the bay and restore the bay’s ecology, have not been taken into consideration, while the costs of other alternatives may have been overstated.
The DGEIS characterizes flaws identified as major for the alternative routes, but downplays what may be considered major flaws for the preferred route. Scenic Hudson recommends that equal consideration be given throughout the analysis to all of the listed alternatives.

Scenic Hudson supports the recommendation in the DGEIS that once a preferred route has been identified, construction of any new truck route will be subject to obtaining permits and approvals, including compliance with SEQRA which will likely require the preparation of a Supplemental EIS.

It is important for us to share tonight that in order to help protect the integrity of this process and the ecology of South Bay, we support the City’s stated position that DEC should not have granted to O&G wetland permits to create a road on the abandoned railroad grade in advance of the City’s DGEIS for the LWRP. Therefore we have appealed the DEC wetlands permit decision so that the issuances of the permit will not unduly influence the outcome of the LWRP process.

Summary
In summary, the City, residents and stakeholders have laid a strong foundation for an LWRP. Scenic Hudson supports many of the recommendations contained in the LWRP that will contribute to the City’s ability to utilize its waterfront as a catalyst for economic revitalization and environmental restoration. The draft identifies South Bay as an asset to the community and proposes recommendations that seek to protect it. However, some of these recommendations are inconsistent with the proposed transportation route that would bisect the Bay.

Scenic Hudson understands that some residents have proposed a slight modification to Alternative 3 that may have additional benefits. Scenic Hudson recommends that given these benefits, this modification be examined in the SEIS recommended by the LWRP.

We urge the City to take the necessary steps to learn more about the natural resources at South Bay, like conducting a field trip with experts and request a harder look at the proposed route and alternatives. We are not seeking to delay or derail progress. However, the community deserves to create a solution to heavy truck traffic that protects their neighborhood and also helps restore South Bay for public enjoyment.

Scenic Hudson is confident that the City can achieve consensus and long term commitment to a final plan that will protect one of Hudson’s assets by finding a sustainable transportation route that avoids serious impacts to residential neighborhoods and natural resources.

Scenic Hudson suggests that in the interim, while the various alternatives are considered, the City should recommend a temporary truck route following the long route identified in the DGEIS in order to immediately protect the health safety and welfare of the public.

Thank you for providing this opportunity to comment on the DGEIS this evening.