



January 3, 2017

Via email: ([climatechange@dec.ny.gov](mailto:climatechange@dec.ny.gov))

Mark Lowery  
NYS DEC - Office of Climate Change  
625 Broadway  
Albany, NY 12233-1030

**Re: Comments on Proposed Part 490**

Dear Mr. Lowery,

We submit these comments on behalf of Seaturck Environmental Association, Inc. ("Seaturck"), a nonprofit organization dedicated to conserving Long Island wildlife and the environment. The organization advocates for conservation policy across Long Island and operates two coastal, public nature centers: the Suffolk County Environmental Center in Islip, where Seaturck is based, and the South Shore Nature Center in East Islip.

On a global scale, tide gauges and satellite altimetry measurements have shown that over the last 100 years (1901-2010), global mean sea level has risen by about 7.5 inches (0.19 meters), with a mean rate of global sea level rise of 0.07 inches (1.7 mm) per year (IPCC 2015).

At the same time, since 1990, New York has experienced a sea level rise of 12.1 inches (0.31 meters) or a rate of 0.12 inches per year, which is nearly doubled that of the global rate. The higher rates of sea level rise observed in the New York region are attributed to the added local effects of subsidence, a sinking of the land.

In order to protect public and private structures, historic places, vital infrastructure facilities, and critical natural resources, the rate of sea-level rise observed along New York coastlines in the past, as well as the rate projected into the future must be considered.

**SEATUCK ENVIRONMENTAL ASSOCIATION**  
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The Part 490 projections, specific for New York State, are based on the scientific predictions for Montauk Point given in Horton et al. (2014) also called the ClimAID Report. The updated ClimAID Report is based on 24 detailed global climate model predictions for the region under varying greenhouse gas emissions scenarios (RPC 4.5, 8.5). ClimAID based projections compare well with those from the RISE Report (Zhang et al. 2015). Both agree for the lower projections but differ slightly for higher projection rates. RISE projections are based on more conservative, IPCC process-based models and slightly different conditions when considering accelerated melting of glacial ice and so, they yield slightly lower projected sea level rise predictions (NPCC 2015). This is a sound scientific method that facilitates inter-county cooperation, recognizing that New York City has already adopted the NPCC/ClimAID projections for planning purposes.

Barrier Islands naturally protect the south shore of Long Island, New York from storm surge flooding and are particularly susceptible to inundation from sea-level rise. The vast coastal, salt marsh ecosystems found all around the Island, acts to filters seawater and to provide habitat for many marine animals including juvenile fish, horseshoe crabs, and shore birds. These vital natural resources are in danger of disappearing as sea levels rise. It is imperative that we take steps to protect them.

Seatuck applauds the NYSDEC effort to develop science-based determinations of present and projected rise in sea-level in the State of New York and supports the Community Risk and Resiliency Act (CRRA). We recognizes Part 490 as a single piece of the larger CRRA and we understand that as such does not impose any requirements on any entity, however, the development of an accepted set of sea-level rise estimates is fundamental to the implementation of the CRRA.

We appreciate the opportunity to comment on the new proposed 6 NYCRR Part 490 and fully support its implementation in within the CRRA.

Sincerely,

*Maureen Dunn*

*Water Quality Scientist  
Seatuck Environmental Association*

#### References:

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<http://nysrise.org/docs/NYSRISE-SBU-ClimateRiskReportforNassauandSuffolk-August2014.pdf>