



# ROCHESTER EMBAYMENT REMEDIAL ACTION PLAN OVERSIGHT COMMITTEE

February 27, 2014

Mr Donald Zelazny  
Great Lakes Coordinator  
New York State Department of Environmental Conservation  
270 Michigan Avenue  
Buffalo, New York 14203

Dear Don,

I am writing at this time concerning the Rochester Embayment Remedial Plan Advisory Committee decision on the United State Army Corps of Engineers proposal for habitat improvement in Braddock Bay.

As you are aware, the United States Army Corps of Engineers has been conducting a feasibility study on actions to improve habitat in the Braddock Bay wetlands, located in the western part of the Rochester Embayment Area of Concern. The USACE presented the project to the RAC in November of 2013 and again on February 6, 2014. After the presentation the RAC deliberated and came to agreement with USACE that proposal 7c was desirable and necessary to the delisting of the habitat BUI, explained hereafter.

The USACE presentations discussed the costs and benefits of the preferred alternative 7c which scored the highest in terms of measured habitat outputs. The preferred alternative, option 7c, involves channeling and potholing, combined with invasive species treatment in the dense cattail marsh in Braddock Bay to increase access to existing wet meadow habitat for aquatic indicator species (ie. Northern Pike spawning, open up space for potential black tern nesting, and facilitate growth of diverse emergent vegetation). In conjunction with this wetland enhancement, an artificial headland breakwater mimicking a sand bar that existed historically would be constructed to protect the outer edge of emergent wetland, enhance the quantity of submerged aquatic vegetation in the bar, and improve water quality by reducing turbidity. This would also provide project resiliency to climate driven extreme storm events and reduce sand accretion and wave impact in the bay. The breakwater construction also includes installation of a pre-filled sand beach; this structure acts as both a source and a sink to the littoral drift. It adds acres of habitat for birds and lower foodweb organisms and serves as a source-and sink for sediment, preventing the structure from continuously accreting sand and disturbing lake sediment transport. In reaching the decision to support the project, the RAC did strongly indicate that it would like to see an effort made in the design phase of the project to reduce costs by evaluating use of local materials, and through any other possibilities for savings that USACE may identify.

This project specifically supports the Rochester Embayment Remedial Action Plan's Habitat BUI "no net loss in quality and quantity (There will still be a net loss due to erosion. The headland will slow but not stop erosion loss, but this compromise was necessary for the project to meet objections of US Fish and Wildlife Service concerning possible increase in nutrient

retention in the bay.) of coastal wetlands” and “suitable habitat for mink” delisting criteria, and Stage II RAP concerns for improving the habitat for American mink, northern pike, and NYS endangered black tern; and loss of habitat caused by erosion and sedimentation.

This project represents a well balanced approach to remedying the environmental issues affecting Braddock Bay. In its decision process the RAC was charged to represent not only the environmental aspects of the project but also the ecological, economic and social interests of the AOC and to carry those principals forward. That said, value is not limited to the number of acres created or protected unto itself; it must also be given in terms of broader ecological values such as the wetland’s size and scarcity that make it a significant area and suitable habitat for black terns, which require large areas for nesting. The wetland represents the only area of its size in the western basin of Lake Ontario. It is also valuable habitat for northern pike which prefer non-turbid waters. The project is supported by the local municipality and business interests associated with the area. NYSDEC and other state agencies support the projects in concept as it pertains to the Lake Ontario Lakewide Area Management Plan coastal wetland impairment and Binational Biodiversity Conservation Strategy, the Great Lakes Restoration Initiative Action Plan, and the existing New York State Great Lakes Action Agenda’s habitat and coastal resilience objectives, including those of the Braddock Bay Fish & Wildlife Management Area Management Plan. Additionally, the project location is identified as a Significant Coastal Fish and Wildlife Habitat by the New York Department of State Division of Coastal Resources. Full agency support of the project will be determined upon a full NEPA or SEQR review.

This project represents a significant management action needed to remove the Loss of Fish and Wildlife Habitat Beneficial Use Impairment. That said, the RAC must still come to agreement upon other management actions necessary to fully delist the BUI.

Thank you for your attention to this matter. If you have questions or concerns, you can reach me at 585-753-5440.

Sincerely,



Charles L. Knauf

Remedial Action Plan Coordinator

Monroe County Department of Public Health

111 Westfall Road

Rochester, NY 14620