



## RARITAN & MILLSTONE RIVERS FLOOD CONTROL COMMISSION

November 1, 2016

Mr. Robert M. Greco, Project Manager  
Civil Works Branch  
Programs & Project Management Division  
US Army Corps of Engineers – NY District  
26 Federal Plaza  
New York, New York 10278

Dear Mr. Greco:

The Raritan Millstone River Flood Control Commission (RMR FCC) has reviewed your recently published flood study entitled, "Millstone River Basin, New Jersey – Flood Risk Management Feasibility Study – Feasibility Report" dated February 2016. The RMR FCC is public Commission, created by the County of Somerset, and have duly appointed members from the County and ten municipalities. These ten municipalities – Manville, Bridgewater, Millstone, Rocky Hill, Hillsborough, Franklin, Raritan, Montgomery, Somerville and South Bound Brook – represent 323,000 people. In aggregate, they have received FEMA insurance payments averaging \$2.5 million per year for the last 37 years. The purpose of the Commission is to foster the design, construction and long-term mitigation for effective flood control measures for the prevention and alleviation of flooding within the basins of the Raritan and Millstone Rivers in priority areas of communication, legislation and policy. Need-less-to-say, the Commission is extremely disappointed in your findings and conclusions.

As you know, the confluence of the Raritan and Millstone Rivers has led to numerous flood events, with catastrophic impact on the residents of Manville and surrounding areas. At this point, approximately one-third of the homes in the area most affected, the Borough of Manville, have been elevated or razed by using funding from other agencies. Approximately 80 more have been abandoned or assumed by lenders and over 500 homes are still at risk, as well as over forty adjacent businesses. In addition, there is the threat to our regional water supply – despite having spent over \$30,000,000 on additional flood protection, American Water's plant came within a foot of being over-topped in a recent flood event. Our plight remains grim.

When we compare our situation with that of neighboring Bound Brook, which has received significant aid from the Corps, we note the following:

- The study area for the Bound Brook project involved many more communities, vastly increasing the number of properties suffering flood losses. Our study only involved portions of Manville, and did not consider flood losses in Somerville, Millstone, Franklin, and most notably, Hillsborough. Had these areas been included, documented flood damage would have been much higher.

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- When your study finally got around to considering the value of the homes in our study, their values had dropped substantially due to repeated flooding. The average home in Manville's most affected area had dropped fifty percent from its value in 2005. Homes worth \$300,000 then are worth \$150,000 today. Conversely, the Bound Brook study was done at a time when valuations were much higher.
- In addition, Bound Brook study included many larger homes with higher intrinsic value. As noted above, the homes in our study area are much more modest in nature. We feel that the study methodology is fundamentally unfair to low and middle income communities, in that the values of our affected homes are so much lower than in more affluent communities with more expensive homes. Flood damage to our homes just does not translate to flood costs as high as in these communities. Even if every home in Manville were used in our study, it would still not add up to the CBR 1 needed to qualify for further funding.

But even using the depressed Manville valuations, your study estimated an annualized loss of \$1,300,000 per year. It would seem that the net worth of this annual loss, over a twenty to thirty year period, would generate a current value of approximately \$30,000,000. It would seem that every house affected in Manville could be elevated or razed for that kind of money, yet the CBR failed to reflect this. (This question was raised in your public presentation of the study, but we have yet to receive an answer to it).

Finally, there is the over-arching question of social injustice. The people in Manville should not be penalized for having modest homes and modest incomes. There is an enormous amount of heartache that goes with living in the hazard area. With every forecast flood event, the residents have learned to rent trailers, fill them with their belongings and park them in a mall parking lot on higher ground. Three hundred trailers on a single parking lot is a pretty impressive sight. But they have learned that FEMA will not reimburse them for personal property losses.

And this injustice is magnified even further when one understands that our constituents don't have the deeper pockets necessary to rebound from flood events. FEMA insurance doesn't cover loss of personal property, alternate living arrangements, loss of work, and a myriad of other costs that our more affluent neighbors are able to withstand. Our people simply cannot cover these costs on their limited incomes. So they suffer in ways that others you have aided do not. Even worse, FEMA limits their payouts to a total of \$250,000 per residence, so that over the multiple flood events we have experienced, the value of flood insurance on their homes goes down, even as the cost of that insurance goes up. Our residents' situation is not stable; it is deteriorating.

They are also caught in a squeeze with mortgages; all their homes are "under-water". Even if they were able to sell their homes, they would still be saddled with debt. And FEMA flood insurance can now cost as much as their mortgage payment. The bottom line is that Manville residents cannot afford to leave and they cannot afford to stay.

Finally, there are a myriad of other impacts, not calculated in your study, all of which are going to increase over time:

- A serious flood event renders roads in all of the Commission's communities seriously compromised, impeding emergency services and all of our commercial activities and schools. At high water levels, we are largely stranded, cut off from the outside road network.
- Loss of historic structures, either due to flood damage or pro-active projects to move them to higher ground, sometimes in other municipalities entirely. We think our heritage is priceless, not subject to formulas and financial modeling.
- The ever increasing costs of clean-up, which fall largely to the County and to the individual home owners.
- The costs of calling out the National Guard to render emergency assistance.
- The reduction in the tax base, both at the residential level and the commercial level, as more and more businesses move away or choose not to improve their properties. Even homes not in the flood plain have suffered drops in valuation as their neighbor's valuations sink lower and lower. The corollary to this, of course, is higher tax rates for the remaining property owners, just adding to the burden they already carry.
- And finally, there is the quality of life that is significantly diminished due to the elevating and/or razing of homes in Manville. The sense of neighborhood has been totally disrupted by the hodge-podge of demolition that has occurred to date. Due to the piecemeal nature of the funding available so far, the demolition has been just as piecemeal.

The Commission has worked on this problem with you for years, lobbying for funds to complete your study, which in the end cost upwards of \$3,000,000 and took several decades to finish. And all that we have to show for it is just a shrug, a sympathetic one to be sure, from the Corps. Your study concluded that our CBR numbers are too low, even as the study itself tells us that there will be more significant, unmitigated, flood events in the future.

And of course, the CBR calculations do not capture the cruelest costs of all, the impacts on the quality of life and emotional drain that our residents feel with every threat of rainfall. Every time a TV weather forecast identifies a large rain event or storm in the Atlantic, these residents re-live the hell they have gone through so many times before. And as they do their best to prepare for the next big flood event, the final blow, now, is the knowledge that the Corps has concluded that they are not worth saving. They feel abandoned and that there is not hope for help for them.

But our Commission's goal is to give them hope. So again, we ask for your assistance. We understand that you have discretionary funds to apply to smaller projects on an annual basis. We would like to develop a proposal for this discretionary pool, doing smaller anti-flooding measures in our basin, elevating homes in flood hazard zones, etc. We will be seeking funds from other sources as well, such that we might be able to multiply the effects of your funding. We feel that funding from the Corps, in combination with funds that we will be seeking from other governmental agencies at the State and County levels, can still make a difference to our residents.

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To that end, we would like to meet with your representatives as soon as possible, hopefully within the month of November.

Sincerely,

A handwritten signature in black ink that reads "Frank Jurewicz" with a circled "FJ" monogram at the end.

Frank Jurewicz, Chairman

cc: US Senator Cory A. Booker  
US Senator Robert Menendez  
US Congressman Leonard Lance  
US Congresswoman Bonnie Watson Coleman  
NJ Senator Christopher Bateman, District 16  
Assemblyman Jack M. Ciattarelli, District 16  
Assemblyman Andrew Zwicker, District 16  
NJ Senator Bob Smith, District 17  
Assemblyman Joseph Egan, District 17  
Assemblyman Joe Daniels, District 17  
NJ Senator Michael J. Doherty, District 23  
Assemblyman John DiMaio, District 23  
Assemblyman Erik Peterson, District 23  
Somerset County Board of Chosen Freeholders  
All Somerset County Municipal Governing Bodies