



October 3, 2022

New York City Council Committee on Parks and Recreation & Committee on Resiliency and Waterfronts

Oversight - Resiliency of the City's Beaches and Waterfronts

Testimony by: Sue Donoghue, NYC Parks Commissioner

Good afternoon, Chair Krishnan, Chair Kagan, members of the Parks Committee and Resiliency & Waterfronts Committee, and other members of the City Council. I am Sue Donoghue, Commissioner for NYC Parks. I'm pleased to be joined today by Iris Rodriguez-Rosa, our First Deputy Commissioner, along with Jennifer Greenfeld, our Deputy Commissioner for Environment and Planning, and other members of our senior staff, as well as colleagues from the Mayor's Office of Climate and Environmental Justice. I want to start by noting our appreciation for the Council's continued advocacy for our city parks, for the resources and support it has provided for our park system, and for convening a hearing on this very important and timely topic.

New York City is a coastal metropolis. Our waterfront is an incredible asset, providing recreational, ecological, aesthetic, cultural, and economic value throughout the five boroughs. However, as we've learned all too well over the last decade, New York City's coastal location, which defines our city and brings us so much joy and pride, also presents significant risks and challenges, in the face of the growing threat of climate change. As the entire world continues to learn and understand, and as we see in the tragic impacts of Hurricane Ian on the Caribbean and states along the southeastern U.S. coastline, climate change is real and is contributing to estimated sea level rise, heightened probability of increased frequency and intensity of coastal storms, and other related hazards that particularly impact land and resources near the waterfront, as well as the population that lives, works, and recreates along our city's shoreline.

As we have learned time and time again in recent years, especially during the darkest days of the COVID epidemic, our city parkland is vital infrastructure, providing open space and recreational opportunities that improve our physical, mental and emotional health and provide a wide array of countless benefits. To make sure our park system remains the best it can be, we're actively planning for the long-term resiliency of all of our parks and open spaces. In addition to approaching capital projects for individual parks with a goal of increasing resiliency, the agency oversees a number of ongoing initiatives to support citywide resiliency measures. Our focus on resiliency continues to evolve, but it has taken on various modes and forms in recent years, some of which I'd like to outline today.

Before we talk about the importance of long-term resiliency planning for our parks, we should first recognize that the City has been forced to undertake massive recovery and repair efforts following major storms, most notably the horrific impacts of Superstorm Sandy, which hit New York City on October 29, 2012, nearly 10 years ago. Though those were tremendously difficult times, as the storm inflicted unprecedented devastation and loss, our city rose to the occasion and came back stronger than ever, and the repair of our parks and waterfront amenities was central to that effort. Following Sandy, the City, with support from the federal government, has allocated over \$1 billion dollars to repair and recovery for NYC Parks properties, representing over 150 City & FEMA-funded projects, including a full reconstruction of the Rockaway Boardwalk, substantial repairs to the Coney Island Boardwalk and the replanting of over 10,000 trees that were lost in the storm.



Though it was necessary to focus on recovery in the immediate aftermath of Sandy, it also completely changed the way we view our park system. In this new reality, improving the resiliency of new and existing parks, playgrounds and open spaces has become a central priority for the agency. Park resiliency is an essential part of NYC Parks sustainability agenda, as we need our city parks and open spaces to withstand and recover from disruptive events such as coastal storms and catastrophic flooding, while also withstanding more gradual systemic threats, such as sea-level-rise associated with global climate change.

New York City has over 520 miles of coastline, and NYC Parks is proud to manage over 160 miles of that expanse, a significant responsibility. Our city's coastline is often the first defense against climate change impacts, so those who design and build public projects on our city's shorelines have a special responsibility to develop vibrant parks and open spaces, and ensure they are safe, so they can continue providing ecological and social benefits well into the future. To this end, NYC Parks is proud to have developed specific design and planning guidelines for the flood resiliency of our city parks, to provide guidance for developing and renovating coastally resilient waterfront parks. These guidelines draw from our decades of experience with waterfront park planning and design, taking into consideration valuable lessons learned after Hurricane Sandy.

Because every Parks site is unique, with varying risk factors, site-specific conditions, surrounding upland context, recreational, ecological, and community needs, we use a contextual, site-by-site approach to planning and design for each new or renovated waterfront project. Resilient waterfront park design needs to account "for the norm, not just the storm." In other words, waterfront parks should facilitate everyday public use during typical weather conditions while still including elements meant to manage and mitigate risk – an approach that maximizes parkland utility and public investment. This can include the mitigation of flood and storm risk, along with consideration of erosion impacts and the importance of park tree canopy and other greening for biodiversity. Of course, this Parks-specific approach is above and beyond the helpful guidance provided to all City agencies, led by the Mayor's Office of Climate and Environmental Justice, in the form of newly updated Climate Resiliency Design Guidelines to ensure that new public infrastructure can withstand the more extreme flooding and other weather events that we can expect to experience in the future.

Beyond the importance of protecting our parks and open spaces themselves from the impacts of climate change, so they can remain places of rest and respite for all New Yorkers, we also know that parks can serve as resiliency infrastructure that helps protect local homes and businesses and the neighborhoods that surround them. Though the approaches can vary depending on location, site conditions & surrounding context, we always seek to maximize those resiliency benefits when we're planning new parks or improving existing parks. This can range in scale, from massive reconstruction projects to site-specific efforts to capture increased stormwater through the use of more permeable surfaces, rain gardens and other retention measures. In partnership with NYC Department of Environmental Protection, we have implemented over \$130 million dollars in stormwater green infrastructure in parks throughout the city, and we are working alongside DEP to advance additional projects such as the daylighting of Tibbett's Brook in the Bronx. The East Side Coastal Resiliency project currently underway will protect East River Park from damage due to sea level rise and other climate impacts, while also protecting thousands of local residents living in neighboring areas that were severely impacted by flooding during Superstorm Sandy. As part of their regional coastal protection and resiliency work, the U.S. Army Corps of Engineers is partnering with NYC Parks on their "Rockaways



Reformulation” project to rebuild and fortify the Rockaway Atlantic shoreline via stone groins along the beachside, a new armored dune, sand replenishment across the full beach, as well as flood protection and mitigation measures along the Jamaica Bay shoreline of the peninsula. In Staten Island, the Army Corps continues to advance design on a 5-mile-long stretch of protective seawall, floodwall, and earthen levee, and a series of inland interior drainage areas on Staten Island’s East Shore, from Fort Wadsworth to Great Kills Park.

Lastly, it is important to note the ways in which our natural areas and ecosystems located throughout our park system also serve as vital resiliency infrastructure. Our agency portfolio includes 10,000 acres of natural areas and our agency is advancing numerous projects around the city to help restore and bolster the resiliency benefits provided by nature. Since Sandy, we have implemented numerous ecological projects and programs, including salt marsh restoration, construction of living shorelines, coastal forest and grassland restoration, marine debris removal, and ecological assessment, an investment over \$25 million dollars. We are advancing multiple coastal wetland restoration projects that are critical to ensuring NYC’s wetlands continue to provide critical functions, such as the absorption of floodwaters for future generations. For example, in recent years, we completed wetland restoration projects at Pugsley Creek Park and Ferry Point Park in the Bronx, which recreated salt marsh that had been lost over the last century, and our dedicated staff are advancing related restoration projects in all five boroughs. Last year, to help guide these efforts, we published the Wetlands Management Framework, in collaboration with the Natural Areas Conservancy. This document is the culmination of ten years of research into the conditions of and threats facing our wetlands and reflects our decades of wetland restoration experience in NYC. The Framework provides a 30-year roadmap for the ongoing preservation, restoration, and management of the wetlands and streams of New York City, with particular focus on those under the care of NYC Parks.

Of course, any discussion of the positive resiliency benefits of our natural infrastructure needs to include our urban tree canopy, which is one of the most vital resources the city has in ensuring our neighborhoods are healthy and thriving, and that they stay cool as temperatures heat up. Protecting and growing our urban forest leads to an incredible array of environmental, social, and economic benefits for our city, such as stormwater capture, cleaning and cooling the air, protecting city pavement from rain and sun, noise mitigation, and increasing property values.

This wide range of ongoing work reflects tremendous thought and hard work from our dedicated agency staff. Since Superstorm Sandy, our staff has provided their expertise to numerous strategic plans and studies undertaken by the City, identifying and prioritizing resiliency and restoration opportunities in all five boroughs, many of which are located in predominantly Environmental Justice and under-invested communities.

As you’ve heard today, resiliency and climate concerns are central to our strategy as an agency and this approach will continue to evolve and grow, alongside our scientific understanding of the challenges we face. New York City has always been defined by ingenuity and innovation—and for that reason, it will remain home to the world’s greatest and strongest parks, natural areas, beaches and boardwalks, even as we all work collectively to manage serious impacts from a changing climate. We look forward to working together with the City Council and other stakeholders to continue to build and maintain a resilient park system for the City of New York. I thank you for the opportunity to testify here today and we look forward to answering any questions you may have.

Testimony of the Resilient Coastal Communities Project on the Resiliency of the City's Beaches and Waterfronts

The [Resilient Coastal Communities Project](#) (RCCP), a partnership between the Columbia Climate School and the [New York City Environmental Justice Alliance](#), seeks to foster new collaborations between environmental justice communities, practitioners, and researchers, as envisioned in Columbia's [Task Force Report on Directed Action](#), to help develop actionable, fundable, and equitable solutions to flood risks that also deliver complementary benefits, like habitat restoration, job creation, and greater community cohesion – and put into practice the Climate School's commitment to [fairness, social justice, and anti-racism](#). The RCCP also unequivocally advocates for increased community voice in flood planning and response in New York City to deliver better and more just solutions.

The RCCP appreciates this opportunity to submit testimony on the issue of coastal resilience - specifically, coastal flooding - in New York City. We note that this hearing was held as communities from Florida to New Jersey struggle to recover from the devastation and immense suffering caused by Hurricane Ian and as we here in New York prepare to observe the tenth anniversary of Superstorm Sandy. These storms remind us of the enormity of the challenges we face as we work to protect our communities from flooding in the years to come.

The risks to the New York City area have become more serious in the decade since Sandy. According to recent projections by the [New York City Panel on Climate Change](#), sea levels in the 2050s are likely to be 11 to 21 inches higher than in 2000. Heavy downpours like [Hurricane Ida](#) and enormous storm surges like those seen during Sandy and Ian will become more frequent, with the greatest impacts falling on communities already most vulnerable due to a history of redlining, disinvestment, and other

inequitable land use policies.¹ Yet often these same communities are sidelined in planning and project developments that take on a top-down and exclusive character.

The problem of protecting New York City from flooding is complex and multifaceted. To be effective, the city and its partners must deal with three distinct problems which our communities simply were not built for:

- *storm surge like we saw with Hurricane Sandy ten years ago,*
- *heavy downpours like Irene and Lee brought us last year, and*
- *seas that will, as stated above, rise by roughly a foot or two higher by 2050 than they were at the turn of the century.*

At the same time, any effective flood protection plan for New York City must seek to achieve widely varying and potentially competing goals, including:

- *Protecting Public Health and Safety*
- *Safeguarding our Natural Systems and Biodiversity*
- *Providing all New Yorkers with access to their Waterfronts*
- *Protecting Community Character and Property, and*
- *Redressing Past Inequality and Building Social Cohesion*

These multiple threats we face and the wide-ranging goals we must achieve, coupled with the fact that there is no playbook, no concise formula and no precedent for dealing with these threats, makes the dangers we face from flooding a great example of what's often called a *wicked problem*.

To solve this enormous and complex problem, we will need to learn from the past and wisely invest our region's considerable resources on a varied and comprehensive set of structural, non-structural and nature-based risk-reduction measures. Current efforts to do so are centered on the [New York-New Jersey Harbor and Tributaries Study](#) (HATS), now proceeding under the auspices of the US Army Corps of Engineers, the States of New

¹ See: [EPA Report Shows Disproportionate Impacts of Climate Change on Socially Vulnerable Populations in the United States](#). September 2, 2021.

York and New Jersey and the City of New York. It's not hyperbole to say that the HATS, which is the largest study of its kind in the United States, is likely *our last real chance to protect our coastal communities and ecosystems from the ever-growing risk of repeated flood-related disasters.*

There are over forty different possible approaches to flood risk reduction identified in the latest phase of the HATS - the "[Tentatively Selected Plan](#)" released last month, on September 26. The key to the success of this monumental planning undertaking will be *picking the right combination of these different approaches in each community* along the entirety of New York City's 520 miles of coastline *and* in dozens of inland neighborhoods facing flooding.

Foregrounding Community Priorities in HATS Planning

The only way for the Army Corps and its state and city partners to craft flood management plans that will actually protect NYC's at-risk communities will be for these agencies to commit to designing such plans ***with*** communities, rather than simply trying to design plans ***for*** them.

Fortunately, the United States Army Corp of Engineers has promised to put communities facing the biggest flooding risks at the center of this planning process. For example, on March 15, 2022, Assistant Secretary of the Army for Civil Works Michael Connor issued an interim guidance entitled "[Implementation of Environmental Justice and the Justice40 Initiative](#)". The guidance directed a new approach to be taken by the Army Corps in planning studies that "*goes beyond 'doing no harm,' to focus on putting the disadvantaged communities at the front and center of [such] studies.*" Assistant Secretary Connor made it clear that such an approach:

"...will require a commitment starting at the earliest phase in the process. USACE is directed to initiate outreach and engage disadvantaged communities early in the process to identify and address problems. The early engagement will be used to help scope the study. USACE will also ensure they [maintain] particular focus on those areas which advance environmental justice."

Here in New York and New Jersey, in furtherance of Assistant Army Secretary Connor's Justice40 guidance, the United States Army Corp of Engineers has promised to convene an *Environment and Climate Justice Working Group* to work with its internal HATS project team. This offers a huge opportunity to center communities in storm protection studies - to go beyond merely *informing* the public to ***learning from and co-planning*** with them.

In its draft Communications Plan for the HATS, the Army Corps makes numerous important commitments to such a partnership with the public on flood protection planning. For example, the Corps promises:

- *effective two-way communication with external stakeholders, reinforcing the [Corps'] commitment to collaboration to find and build consensus on the most feasible, environmentally acceptable, innovative and effective solutions;*
- *a culture of commitment to public openness and transparency; and*
- *[to] incorporate stakeholder input into future plans and ensur[e] that disadvantaged communities' input is included.*

The Army Corps additionally states that *“Public participation and meaningful incorporation of their input [are] key to the study's success.”*

These are extraordinary commitments by the Army Corps, inspired and powered by the Biden Administration's Justice40 Initiative. Should the Army Corps and its city and state partners prove able to keep these commitments, it would set a vastly higher bar for future community consultation and empowerment in resilience planning, both here in New York City and elsewhere in the US. Such improved community consultation and increased empowerment will, in turn, help ensure that our efforts to manage the enormous and complex risks associated with coastal flooding will be better informed, more effective and have more support at the community level. We are encouraged that the City of New York has expressed support for this working group, which could serve as a model for

other communities seeking to protect themselves from flooding and achieve the broader goals of the Justice40 initiative.

A key challenge to achieving the goals of the HATS Environmental and Climate Justice Working Group is that the Army Corps has determined that the process of public comment on the HATS “Tentatively Selected Plan” must be completed by January 6, 2023. That’s essentially three months after this community engagement and empowerment plan – perhaps the largest and most complex plan of its kind ever undertaken – was first shared with the public. Moreover, this timeline was created without even having convened the working group, whose work is critical to ensuring that the concerns, priorities and proposed solutions of those most impacted by the threats of climate change are fully centered in the final plan.

The good intentions and high hopes associated with the HATS Environment and Climate Justice Working Group will likely be squandered if this working group and the Army Corps’ other outreach and empowerment efforts are not given sufficient time to achieve their goals. To keep community priorities in the forefront of the planning process, a far longer timeframe for consultation is essential - *three months for public comment and co-planning simply is not enough.*

And, so, we ask the Committee on Resiliency and Waterfronts and the Committee on Parks and Recreation to resolve – with all your fellow councilmembers, if possible – that the Army Corps vastly expand its public comment period for the HATS Tentatively Selected Plan and provide the council with a revised timetable and strategy for public engagement that matches up with the Corps’ laudable promise to fully inform and enfranchise the public in the development of all strategies and initiatives to be included in the HATS coastal protection plan, even if that takes a year or more to do.

Given the importance of the HATS to the future safety and vitality of the New York metropolitan region, we simply must do everything we can to assure that our communities are, to quote Assistant Secretary Connor, at “the front and center” of this critically important planning process.

Respectfully submitted,

The Resilient Coastal Communities Project

Bernadette Baird-Zars, Columbia World Projects

Paul Gallay, Columbia Climate School

Annel Hernandez, Columbia School of International Public Affairs

Jacqueline Klopp, Columbia Climate School

Hannah Lin, Columbia Climate School

Aya Morris, Columbia Climate School, Massey University

Victoria Sanders, New York City Environmental Justice Alliance



**New York City Council Committee on Parks and Recreation
Monday, October 3, 2022
Committee on Parks and Recreation- Beaches and resiliency
Sherrise Palomino, Director of Advocacy and Programs**

Good afternoon, my name is Sherrise Palomino and I am the Director of Advocacy and Programs at New Yorkers for Parks (NY4P). We are a founding member of the Play Fair Coalition, which includes over 400 organizations from across the five boroughs. Thank you to the Committee on Resiliency and Waterfronts and the Parks Committee for the opportunity to speak about the resiliency of city beaches and waterfronts. I also want to thank Chairs Krishnan and Kagan for their leadership on this important issue.

This climate crisis has highlighted the critical needs of our parks system including adequate funding for park staffing to do resiliency work and to address inequities in access, infrastructure, and general maintenance. The city's decades long disinvested in parks continues to exacerbate these tragic inequities in our parks system. The city council and mayor can fix it by making the 1% investment of the city budget into parks.

Beaches like Coney Island and the Rockaways need urgent investments in maintenance and upkeep. With a well-funded parks department, our beaches and waterfronts can be properly maintained. Basic maintenance issues on the Coney Island boardwalk can reduce issues for beach goers from damaged planks of wood and exposed nails. Many parks advocates and community leaders invest their time volunteering to do jobs that NYC Parks department has not been able to adequately fund like cleaning up beaches and supporting our wetlands that are much needed at our beaches and waterfronts. New York is the greatest city in the world with a parks system that does not reflect modernity nor have the proper infrastructure to support the climate crisis we are living in.

We are overdue for transformative investment in our parks system – 1% of the city budget for parks could improve maintenance for the 160 miles of waterfront that NYC Parks manages and ensure that our beaches and waterfronts are well-maintained and equitably serving New Yorkers of all communities and backgrounds. The NYC Parks department does a valiant job maintaining these aging resources but needs more funding to do so. It is time to allocate 1% of the city's budget to parks.

For over 100 years, [New Yorkers for Parks](http://www.ny4p.org) (NY4P) has built, protected, and promoted parks and open spaces in New York City. Today, NY4P is the citywide independent organization championing quality parks and open spaces for all New Yorkers in all neighborhoods.
www.ny4p.org



New York City Environmental Justice Alliance Testimony on the Resiliency of the City's Beaches and Waterfront To NYC Council Committee on Resiliency and Waterfronts, Jointly with the Committee on Parks and Recreation

October 3, 2022

Founded in 1991, the New York City Environmental Justice Alliance (NYC-EJA) is a non-profit, 501(c)3 citywide membership network linking grassroots organizations from low-income communities of color in their struggle for environmental justice. NYC-EJA empowers its member organizations to advocate for improved environmental conditions and against inequitable environmental burdens by the coordination of campaigns to inform City and State policies. Through our efforts, member organizations coalesce around specific common issues that threaten the ability for low-income communities of color to thrive.

NYC-EJA is a major proponent of creative and multifaceted green infrastructure solutions and is a member of the Forest for All NYC (FFANYC) Coalition which seeks to justly and equitably protect, maintain, expand, and promote the NYC urban forest, which is a key asset in climate adaptation and can help New York City's fight against climate change and its disproportionate impacts on disadvantaged communities. As things stand, the NYC urban forest is not distributed evenly or fairly across the many communities in NYC, meaning that its benefits are also not equitably enjoyed. Despite recent efforts to improve tree canopy cover, communities of color and low-income communities still have far less access to greenspace and its benefits than wealthier, whiter communities. Those inequitably distributed benefits include a variety of things like cooling the air, offering shady respite from heat, sequestering carbon, increasing energy efficiency, and, if implemented thoughtfully, decreasing the impacts of flooding and improving and restoring natural areas. Climate frontline communities have reduced access to benefits of the urban forest, have less tree canopy cover, fewer/smaller natural areas, and less access to the waterfront, natural or otherwise. We would like to see green infrastructure solutions that help fight storm surge and flooding while also restoring natural habitats such as wetlands and beaches in environmental justice communities, making them both accessible and multipurpose.

The City's Combined Sewer Overflow system continues to present challenges and issues during extreme rain and flood events. Communities of color are the most likely to be impacted by these types of weather events, with high proportions living in flood plains and flood-prone parts of the city. What actions are being taken to improve the CSO problems and decrease the flooding consequences of those problems?

In 2013, NYC-EJA helped to amend the [Community Right to Know Law](#), an amendment that the City enacted. Part of this amendment was to ensure that facilities in special flood hazard areas

were properly preparing for extreme weather events to prevent the release of dangerous substances into floodwaters. While this was enacted with plans for enforcement within the law, we have not seen action on this and would like to encourage the City Council to ensure that this law is being properly enforced for the protection of community and public health as floods become more and more common.

Finally, in regards to the US Army Corps of Engineers NY/NJ Harbor and Tributaries Study, we urge the city to remain vigilant and engaged in the process to protect the city and its most vulnerable residents from the threats of climate change. This study may be our last good chance to protect coastal communities throughout the New York New Jersey metro area. The study is said to be the largest of its kind, done in partnership with the states of NY and NJ and NYC, covering 900+ miles of affected shoreline, 25 counties in New York & New Jersey. The affected population is roughly 16 million people, including New York City and the six most populated cities in New Jersey.

This study needs to deal with three distinct problems, which our communities simply were not built for: storm surge like we saw with Hurricane Sandy ten years ago, heavy downpours like Irene and Lee brought us last year, and seas that will rise by a foot or more over the first half of this century. The plan the USACE has tentatively selected from among the five studied has a combination of storm surge barriers and shore based measures throughout the NYC metro area, in places like Jamaica Bay, Newark Bay, Jersey City, the Lower West Side of Manhattan and East Harlem. The USACE has promised to put the communities facing the biggest risks at the center of this planning process, and that will be absolutely essential if we're going to get this right. While their tentatively selected plan is better plan than the big in water barriers recommended in other versions presented because it can help with all three of the threats we face (which the in water barriers couldn't do), designing solutions that protect the safety and vibrancy of hundreds of communities over a 900 mile stretch will require enormous creativity, investment and, again, centering communities in what is done to provide for their own futures. We hope the City Council will stay alert and engaged in the HATS study and lend its own support to the needs of the communities most vulnerable, with the most to gain from success and the greatest potential for additional burden and loss with failure.

Testimony of the Partnership for New York City

New York City Council Committees on Resiliency and Waterfronts and Parks and Recreation

Oversight: Resiliency of the City's Beaches and Waterfronts

September 15, 2022

Thank you for the opportunity to testify on the city's waterfront resiliency. The Partnership for New York City represents private sector employers of more than one million New Yorkers. We work together with government, labor, and the nonprofit sector to maintain the city's position as the preeminent global center of commerce, innovation, and economic opportunity.

The Partnership applauds the Council's focus today on waterfront resiliency and we call particular attention to the vulnerability of the vibrant and economically significant neighborhoods that make up Lower Manhattan. The public and private sectors have invested heavily in the modernization and redevelopment of Lower Manhattan – investments that must be protected and reinforced by an aggressive program to protect the area from rising sea levels and extreme weather.

We particularly want to support the plans of the Battery Park City Authority (BPCA) to harden the coastline of the 92-acre Battery Park City community, World Trade Center site, and surrounding commercial districts that represent such an important public investment and symbol of the city's strength and resilience. We cannot afford to delay or shortchange the resiliency program that the BPCA is prepared to undertake for this portion of our coast.

A decade ago, Superstorm Sandy exposed the substantial vulnerabilities of Lower Manhattan to the impacts of climate change such as sea level rise, more frequent and more severe storms, and storm surges. By the 2050s, 37% of buildings in Lower Manhattan will be at risk from such storm surges. Sea-level rise will submerge parts of Lower Manhattan on a regular basis and put at risk critical infrastructure and jobs. Preservation of the significant investments made in Lower Manhattan, which have contributed to the dramatic increase in residents, jobs, tourists, businesses, and infrastructure, should be a key priority for New York City and the region.

The city has developed a comprehensive waterfront resiliency strategy in its Lower Manhattan Coastal Resiliency Project that is carefully designed to reduce flood risks from coastal storms and sea level rise in Lower Manhattan. The BPCA's South Battery Park City Resiliency Project is a critical component of the strategy. It has been developed with broad community input and includes expansive lawns and gardens as well as public programming and amenities. Once complete, it will link with adjacent projects to the south and north as part of the city's coastal resilience plan. Thank you.



Testimony of the Partnership for New York City
New York City Council
Committees on Resiliency and Waterfronts and Parks and Recreation
Oversight: Resiliency of the City's Beaches and Waterfronts

October 3, 2022

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Testimony of Michael Dulong, Senior Attorney, Riverkeeper, Inc.

**Before the New York City Council Committees on
Parks and Recreation and Waterfronts and Resilience**

Oversight Hearing on Waterfronts

October 3, 2022

Thank you, Chairpersons Kagan and Krishnan and Members of the New York City Council Committees on Parks and Recreation and Resiliency and Waterfronts, for your attention to the New York City waterfronts. I am a Senior Attorney for Hudson Riverkeeper, which protects and restores the Hudson River from source to sea and safeguards drinking water supplies, through advocacy rooted in community partnerships, science and law.

As your Committees are well aware, the city's 520-mile waterfront is undergoing great change at rapid pace, with rising sea levels, major climate adaptation projects, and thousands of units of shoreline commercial residential development. Yet 10 years after Superstorm Sandy, the city has not published a coordinated plan to address sea level rise and prepare for the future livability of our waterfront neighborhoods.

I. The Adams Administration missed the September 30, 2022 deadline for the AdaptNYC Plan.

Riverkeeper and partner organizations advocated strongly for Intro 1620, which was initially drafted to require the Mayor's Climate Office to develop a unified plan for the waterfront. Following Post-Tropical Cyclone Ida, the legislation was appropriately expanded and passed as Local Law 122 to include other climate threats facing the city, especially precipitation-related flooding, with a focus on environmental justice. That plan was due on September 30, 2022, but it was not published.

In January of this year Riverkeeper and other organizations in the Rise to Resilience Coalition met with representatives from the formerly-named Mayor's Office of Climate Resiliency, who were then well on their way toward producing what was tentatively called the "AdaptNYC" plan. Following that discussion, Riverkeeper sent multiple communications to the Mayor's Office of Climate and Environmental Justice. We joined with 14 other environmental and environmental justice organizations in August to submit recommendations¹ for improving the city's Green Infrastructure Program. It is unclear what has changed since then. Although Riverkeeper has provided input for the plan on multiple occasions and met with representatives of the Mayor's

¹ Riverkeeper et al, Building an Equitably Green New York City, <https://www.riverkeeper.org/wp-content/uploads/2022/08/Building-an-Equitably-Green-New-York-City-1.pdf>.

Office to discuss these issues as recently as this summer, we were unaware the deadline would be missed. A website² for the plan still acknowledges that a plan is forthcoming.

Riverkeeper demands that the Mayor's Office of Climate and Environmental Justice release the climate adaptation plan immediately. And we respectfully urge the Council Members to take action to ensure its release.

II. The United States Army Corps of Engineers has proposed a \$52 billion network of storm barriers and shoreline hardening measures for the New York Harbor.

As your Committees know, the Army Corps has released its Tentatively Selected Plan³ to construct a suite of coastal storm risk mitigation measures throughout the city. Some of the major in-water components include storm surge barriers across the mouths of Jamaica Bay, Arthur Kill, Kill van Kull, Gowanus Canal, Newtown Creek and Flushing Creek. Storm barriers pose numerous threats to waterways and the marine life within them. Such barriers, even if left open most of the time, can hamper sediment transport, fish migration and flushing of combined sewer overflows. It is crucial for potential significant adverse environmental impacts to be thoroughly evaluated before finalizing the plan.

The Army Corps also proposed shore-based measures that could include seawalls, levees, floodwalls, and deployable flood barriers for Manhattan around the southern shoreline and along the Harlem River; Queens at Flushing, East Elmhurst, Long Island City and the Rockaways; Brooklyn in Greenpoint and Redhook; and northern Staten Island along the Arthur Kill. It is important that these measures be designed equitably and in a "living shoreline" manner that supports aquatic life where feasible. The plan will have widespread impact on New Yorkers, their waterfronts, and their waters. Comments on the plan are due by January 6, 2023.

At this juncture, we respectfully urge the Council to work with the Rise to Resilience Coalition and demand that the Army Corps conduct significant and meaningful public engagement related to the plan. Such engagement would include releasing a public participation plan and establishing an Environment and Climate Justice Advisory Committee for the study to advise the Corps on how to ensure that the concerns, priorities, and proposed solutions of those most impacted by the threats of climate change are appropriately centered in the Corps' final plan. The Corps should also develop, in conjunction with the advisory committee, a robust outreach strategy and timeline for reaching coastal communities, a process for involving frontline organizations in the planning, and a process for how the state and city partners will work together to maximize engagement.

² New York City Mayor's Office of Climate and Environmental Justice, NYC Climate Adaptation Roadmap, <https://www1.nyc.gov/site/sustainability/legislation/adaptnyc.page> ("In 2022 MOCR will release a new strategic plan for climate adaptation in NYC. . . . In accordance with LL 122 (2021) the plan will identify areas of the city highly vulnerable to climate hazards and consider the potential impact of identified adaptation measures on environmental justice areas.").

³ The Tentatively Selected Plan is available at: <https://www.nan.usace.army.mil/Missions/Civil-Works/Projects-in-New-York/New-York-New-Jersey-Harbor-Tributaries-Focus-Area-Feasibility-Study/>.

III. The State Department of Environmental Conservation is collecting information about recreational uses of New York City’s waters in contemplation of changing designated uses.

New York State is asking for help identifying where and how people use New York City’s saline waters, as the agency reconsiders what standards those waters must meet. The Department of Environmental Conservation has issued an “Advanced Notice of Public Rulemaking”⁴ seeking information on whether and how the area’s saline waters should be reclassified. It is important that the Council get involved, as the rulemaking process may determine which waters and areas of the city will be allowed to have public recreational access.

Under the Clean Water Act, New York State sets water quality standards based in part on how people use the water, in addition to other data about the quality of those waters. Where waters are designated for “primary contact” such as swimming, the pollution levels in those waters will be subject to strict standards and controls. Waters with less protective designated uses such as “Secondary Contact” (e.g., boating) and fish propagation are also assigned pollution limits.

The state’s potential reclassifications could tighten water quality standards for some waterways, while they could relax the water quality standards for others (e.g. swimming and bathing) by designating them as more or less protective use classes. In order to prevent the rollback of water quality protections, it is important to ensure that the state has an accurate accounting of how the waters are used. We urge the Council Members to ensure that city agencies who have information about the uses and quality of New York City’s waters, such as the Parks and Environmental Protection Departments, submit all data in their possession as part of the rulemaking. The deadline for submitting data is October 25, 2022.

Riverkeeper and partners are also collecting information from the public, and we could use your help to get the word out. Each year thousands of intrepid New Yorkers take to their waterways to swim, kayak, surf, jet ski, and fish, among many other recreational activities. We want to hear from them by filling out our survey at: <https://wikimapping.com/water-recreation.html>.

* * *

Thank you for your consideration of Riverkeeper’s testimony. We look forward to working with the Council Members, the Adams Administration, and our partner organizations to ensure New York City takes action to prepare for climate change.

Contact:

Michael Dulong, Riverkeeper, Inc., 914.422.4133, mdulong@riverkeeper.org

⁴ N.Y. State Dep’t of Env’tl Conservation, Advanced Notice of Public Rulemaking - Saline Waters Reclassification, Environmental Notice Bulletin (July 27, 2022), <https://www.dec.ny.gov/regulations/125679.html>.



New York City Council's Committees on Resiliency and Waterfronts and Parks and Recreation
3 October 2022

Scientists in the school of Marine and Atmospheric Science have been actively engaged in making scientific research count in the region from its roots in 1965. I myself have been professor of oceanography here for over 40 years, long enough to remember Hurricane Agnes in 1972, Hurricane Gloria in 1985 and a host of other devastating storms. At the time, NY's response was to ID erosion hazard areas¹, a designation long overdue for an upgrade. You also might remember Halloween Storm² or "The Perfect Storm" in 1991 and the "Storm from Hell" in 1992 leading to NY Atlantic Coast Monitoring System starting 1993 but one that was abandoned in 2001. Superstorm Sandy was a "game changer" renewing attention to some of the city's deepest coastal vulnerabilities and leading to a Resiliency Institute for Storms & Emergencies to marshal research on preparedness and response to natural disasters. But even as the memory of Sandy is fading, clearly the attack has been unrelenting and, even if it doesn't get worse, the infrastructure and population at risk are increasing. Something as commonplace as sand underpins the protection of vital infrastructure. Some four million cubic yards of sand in the Rockaway Peninsula and Coney Island were lost during Hurricane Sandy threatening coastal sustainability. This year (2022) the UN Environmental Program recognized sand is a strategic material in the quest for coastal sustainability², as should we. While there is no silver bullet, it is crucial to sharpen all our tools updating coastal erosion hazard areas, restoring systematic monitoring of status and trends. We need our commitment to good stewardship, good governance, a rigorous institutional structure, and, most importantly, continuing to provide comprehensive scientific analysis. We will improve through opportunities, such as Stony Brook University's effort to develop a Center for Climate Solutions in close collaboration with NYC and its most impacted communities.

Respectfully submitted,

Henry Bokuniewicz
Distinguished Service Professor of Oceanography
School of Marine and Atmospheric Sciences
Stony Brook University
Stony Brook, New York 11794-5000

Phone: 1-631-632-8674
Henry.bokuniewicz@stonybrook.edu

¹ Coasta; Erosion Hazard Areas or CEHA.

² UNEP 2022. Sand and sustainability: 10 strategic recommendations to avert a crisis. GRID-Geneva, United Nations Environment Programme, Geneva, Switzerland

October 03 2022 Boardwalk testimony

I have been a resident of the Coney Island Peninsula for over 20 years.

Recently our community has been hearing about a proposal to replace the wood boardwalk with concrete paving. I would like to provide a few points against the use of the concrete.

1. **Lethal Heat Zones.** Our area got slammed by record-shattering heat this summer, partly we can blame the concrete. When combined with the heat released by vehicle engines, paved areas can boost the temperature in cities by as much as 22°F, according to the Environmental Protection Agency.

Soaring city temperatures aren't just unpleasant. They can be lethal. Heat already kills more Americans than hurricanes, lightning, tornadoes, floods, and earthquakes combined.

Total area of the Riegelmann Boardwalk is 836,000 sf.

MCU Stadium field is 112,000sf. We will be adding 7.5 MCU fields of concrete to our neighborhood.

2. **The process of concrete manufacturing is very harmful to our environment.** It often slaughters river-dwelling fish and birds, damages coral reefs, undermines bridges and causes riverbanks to collapse.
3. **It's not as permanent as it looks.** The most frightening aspect of our dependence on concrete might be that the structures we build with it won't last. The vast majority of them will need to be replaced—and soon, within decades.

We tend to think of concrete as permanent as the stone it mimics. It's not. Concrete fails and fractures in dozens of ways. Heat, cold, chemicals, salt, and moisture all attack that seemingly solid artificial stone, working to weaken and shatter it from within. If it's not monitored and maintained, most concrete slowly disintegrates.

We will be saving our environment and our community by keeping the Riegelmann Boardwalk covered by wood planks as it was for 100 years of its existence.

Sincerely,

Angela Kravtchenko, AIA

Coney Islanders for an Ocean Side Ferry

To all decision makers:

My name is Lan Hu. I'm writing to express my concern over the coney island ferry located at Coney Island Creek. Hoping you could use your conscience and intelligent to serious look into the operation and move it to the ocean side.

I don't against former mayor's ferry agenda, but the choice of this location is rather than a short cut to achieve his agenda without consent from the community and a cover-up for EDC's financial mismanagement on the expense of a disadvantaged community's wellbeing and a wildlife sanctuary. This location also creates a foreseeable destructions on existing nature storm barriers like sand dune and wetland.

To build the ferry in Kaiser Park takes away a recreational area that is crucial to a community that has long been in disadvantage from city's development. It takes away a community physical and spiritual retreat.

The narrow and shallow channel along the ferry's path between Calvert Vaux park and Kaiser park requires a lot of widen and deepen dredging now and the future for the vessel sail through. The turbulence sounds and waves create by the vessel will definitely cut-off those bird's food searching path between the 3 parks and wipe out

the whole wildlife habitat including those shallow water critters like horseshoe crabs. Coney Island creek and its wildlife habitat is valuable to New Yorkers, not developers. Once they're gone, they're gone forever. Coney Island creek serves a much higher purpose to the community and wildlife than a ferry will bring.

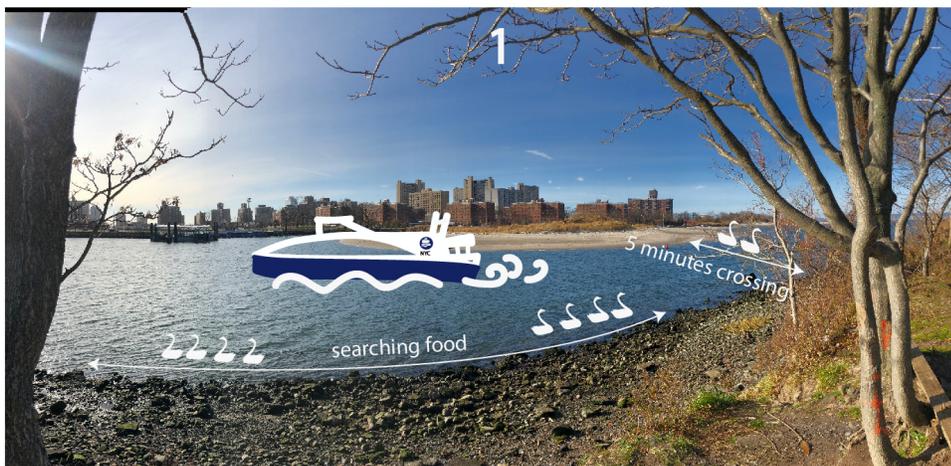
To EDC's saying the location provides better protection from the ocean...If it's possible to have a ferry at Bay Ridge now, and a Steeplechase Pier century ago, it's possible to have the ferry built at the ocean side.

Attached please find my illustration and hope it shows the impacts.

Thank you for your reading and consideration.

Regards

Lan



The path of the ferry has a narrow channel that is between Calvert Vaux Park, Coney Island Creek Park and Kaiser Park, when it's high tide, I have seen it takes less 5 minutes for swans swimming across. So the turbulent waves, sounds caused by ferry will destroy the crossing and whole wild life habitat that has been conserved all these years.

There are so many missing pieces to this ferry proposal. Over the course of this assessment and public comment period, I haven't heard or seen anything that indicates any communication or council with the original inhabitants, the Munsee Lenape people. We deserve to know what they have to say about their land and if they're interested, I believe we need to open the doors of communication for educational purposes. I had a chance to speak with one of the representatives about the plans and resources needed to move the ferry dock to the ocean side. I heard only how much more expensive it would be. But what I surmised through what he said was opportunities to teach our residents to swim, something that can help to prevent further tragedy in our waters. As well as engineering and oceanography partnerships with local schools and organizations. A well-known psychologist I follow said that you can't get time back by throwing more time at it. While the relocation will cost more, it will surely cost less than the ecological and community effects of building it right where we and our children play. Kaiser Park served as an inspirational space for me this summer as I was preparing a business plan. Why is the safety and health of this community never more important than the plans of non-residents who feel they own it? Where are all these people going to fit? Why is there so much more housing than opportunities for jobs? We've been forced to rely on the other transportation methods like this ferry because there are not enough jobs in South Brooklyn. Why is one of the smallest boroughs the main thoroughfare for commerce? Why are jobs so much more abundant in this area? Why are none of the construction projects I continue to see pop-up in Coney Island commercial? Who answers these questions? Who actually cares about us? There are many small towns globally that support their residents with career and entrepreneurial opportunities as well as health, benefits and child care. When that happens, people don't feel the need to leave or commute 1-3 hours for work. As someone who has worked in Luna Park and the Coney Island Amphitheater, I am well aware of the amount of money this community brings in during the summer. If a portion of it is regularly allocated to support the people who work in this places and share proximity to their homes every spring and summer, we will be able to offset much of the poverty which has persisted for decades. How much of this project even included construction workers, architects, ecologists or other stakeholders who reside here? Spiritually, I feel major disaster looming with this Creekside Ferry and God is a higher being than anyone in the EDC. I said it at the Council Town Hall on August 25th and I'll say it again. Move it to the oceanside, regroup and spend the money it will cost to safely execute this project, or let it go. Sometimes, that is the best option. The recourse could shake the foundation of this community, and who's going to be responsible for cleaning that up?

Rachel Morrison

From: Ida Sanoff <ida.sanoff@gmail.com>
Sent: Thursday, October 6, 2022 11:12 AM
To: Testimony
Subject: [EXTERNAL] Testimony Re: Joint Parks and Waterfront Resiliency Committee Hearing held on October 3, 2022
Attachments: Concrete_Slab_Storm_Surge_Impacts.pdf; Rockaway concrete storm damage 1.jpg; Rockaway concrete storm damage 2.jpg

There is no question that the historic, iconic, Coney Island/Brighton Beach boardwalk is badly in need of repairs. Designed and built as a pedestrian thoroughfare, it has been turned into a virtual highway by the NYC Department of Parks and Recreation (Parks). While NYPD has also contributed to this problem, they at least are taking steps to prevent further damage by using lighter weight vehicles such as scooters and vehicles similar to golf carts (also known as "gators"). The Parks Dept. should be required to eliminate their use of heavy vehicles on the boardwalk.

Prior to Hurricane Sandy, the Parks Dept. began to replace some of the wooden boardwalk sections with concrete slabs, with or without a decorative, fake plastic wood overlay. Since the Parks Dept. did this section and subsequent sections as "pilot studies" they have avoided any environmental impact studies. Prior to Hurricane Sandy, we told the Parks Dept. that we were concerned about storm surge impacts being exacerbated by the concrete slabs. Their response was that "a storm surge would never hit the boardwalk". Well it did hit the boardwalk and there was a significant difference in storm surge impacts and flooding on streets adjacent to the concrete slab section at Ocean Pkwy as compared to the wooden sections on either side of it. See attached document.

There are blocks and blocks of apartment buildings, including high rises that are either directly on top of the boardwalk or perhaps a block away. During Hurricane Sandy, concrete slabs on the Rockaway boardwalk lifted up. See attached document. They are lifted by flood waters and become multi ton battering rams, capable of doing catastrophic damage to the walls of buildings. There used to be a concrete walkway called the Esplanade that connected Manhattan Beach to Brighton Beach. It was destroyed by a hurricane in the 1960's, but several sections remained in place. During Hurricane Sandy, one of those old sections lifted up and broke a substantial hole in the foundation of an apartment building just east of Bay 1 in Brighton Beach. The Parks Dept. should be required to evaluate storm surge impacts before they install any more concrete slabs (with or without overlay) because of the potential for significant damage to the homes of the thousands of people who live near the boardwalk.

It is interesting to note that the walkways of the historic, iconic Brooklyn Bridge are constructed of the same types of wood as the boardwalk, yet they are in far better shape. The Brooklyn Bridge walkways are as heavily used as the boardwalk, may even more so, but they are in better shape, because they are maintained. So it is possible to have a safe, well maintained wooden boardwalk. Don't the facilities of southern Brooklyn deserve the same care as those of northern Brooklyn?

Furthermore, the Wildlife Conservation Society, parent organization of the NY Aquarium, has a special forest in South America, designated to sustainably grow hardwoods for the Brooklyn

Bridge: <https://www.brooklynbridgeforest.com/> In fact the NY Aquarium has signs proudly proclaiming that the wood in front of it comes from this special forest.

And speaking of the Aquarium, we have heard that the Coney Island amusement area will have a wooden boardwalk in perpetuity. This is the most heavily used part of the boardwalk, yet it is in far better condition than other parts of the boardwalk. why? Because the Parks Dept. maintains it! And why isn't the rest of the community deserving of the same consideration?

Again, there is no question that the boardwalk is badly in need of repairs. But it is inexcusable not to evaluate whether or not those proposed repairs can potentially cause catastrophic damage to the homes of the thousands of people who live adjacent to it. Many communities in the metro area as well as along the East Coast have replaced entire boardwalks in similar length to our, with wood, in a relatively short time span. Furthermore, those boardwalks safe walkways that are beautifully maintained? Why can't NYC do the same? And why hasn't anyone asked why the Brooklyn Bridge walkways - constructed of the same types of wood as our boardwalk - are in such good condition?

Thank you for accepting these comments.

Ida Sanoff
Brighton 1st Rd.
Brooklyn, NY 11235

Brighton Beach/Coney Island Boardwalk
Between Ocean Parkway and Brighton 1st Road

Concrete Slab Section installed between two older, wooden sections



A few years ago, a section of the wooden Boardwalk (between Ocean Parkway & Brighton 1st Road) was replaced with concrete slabs, as a pilot project.

Despite submission of 150 years of Army Corps of Engineers storm surge data, the Parks Department told us that *“a storm surge will never hit this Boardwalk”*.

Our concerns about safety issues were ignored. Our concerns about increased storm surge damage were ignored. Our calls for an Environmental Impact Statement were ignored. The Parks Department told the community that if they were so concerned, they should hire their own experts to do the studies, knowing that we could not afford to do so.

THIS IS WHAT HAPPENED....

These photos were taken on 11/4/12, a few days after Hurricane Sandy.

There was a significant difference in storm surge impacts adjacent to and upon concrete slab Boardwalk sections as compared to traditional wooden sections:

1) NYC’s recently released *Special Initiative for Rebuilding and Resiliency Report* states that “At Ocean Parkway...waves pushed thousands of tons of sand northward, with water traveling 1.5 miles north, to Avenue W”.

2) There was erosion under the concrete sections but **no erosion under the wood.**

3) Sand was piled up by the storm surge to the level of the wooden boards and several inches of sand accumulated on top of the boards. **This indicates that the speed of the storm surge wave slowed down and suspended sand settled out. This may have occurred because the porous, slatted, wooden surface and/or the grain of the wood created friction.**

4) On the street adjacent to the wooden section, there was minimal sand accumulation, just inches.

5) No sand settled out on top of the concrete slabs, but there was significant deposition of sand, several feet deep, on adjacent streets & roadways. This indicates that the storm surge wave did not slow down when it went over the concrete slab. Since it is well known that concrete can concentrate wave energy, the force of the wave may even have increased.

6) What is also interesting is the degree of flooding in buildings adjacent to the concrete as opposed to buildings adjacent to wood. In 3101 Ocean Pkwy, the flood waters were 15 feet high. The entire first floor had to be gutted. 40 Brighton 1st Road is directly behind that building. At the end of the block is wooden section. This building only had 6 feet of water.



Boardwalk at Brighton Beach, approx. two blocks east of Ocean Parkway, looking east

The arrow indicates where the new concrete slab section ends & the traditional wooden section begins. There is significant erosion under the concrete slab section, which then tapers off over a few feet (Note that there is a short staircase at the beginning of the wooden section) as you get closer to the wooden section. There is no erosion under the wooden section & the sand is piled up flush to the top of the boards.



The same concrete slab section looking towards the west.

At the right margin of the photo there is a shade pavilion that extends out over the sand & the concrete Boardwalk is behind it. There is significant erosion under the concrete slab section.



A close up of the western end of the same section shown in the previous photo.

The arrow indicates where the concrete slab ends. The erosion stops abruptly as soon as the wooden section begins.



The line of demarcation is even more dramatic up close. The eroded area varied from 1-3 feet in height for the entire length of the concrete slab section, about three blocks.



The impacts on top of the Boardwalk were even more dramatic. Here is the same concrete slab section, just west of Ocean Pkwy. The view is looking east, towards the shade pavilion. Notice that there is NO SAND on top of the concrete slab section.



Same view as before, but standing a little further west. The lighter colored concrete slab portion is in the background near the shade pavilion - remember that there was not a drop of sand on top of the concrete slabs. Yet just a few feet away, there are several inches of sand on top of the traditional wooden section.



Ocean Pkwy. So what happened to the sand that eroded out from under the concrete portion? It ended up in piles several feet high on the street & sidewalk. Some of the sand has been shoveled off the roadway. Look how much there is - take a look at the size of the piles. Notice the apartment building at the extreme right.



This is the garage at the rear of the building in the previous photo. The cars on the first level are almost completely covered in sand. The sand reaches almost all of the way down the alleyway. This block is Beach Walk, a mapped pedestrian path.



This view looks north on Beach Walk, near its intersection with Brighton Beach Ave. You can see how deep the sand is and how it extends all the way down the block.

THIS IS A PUBLIC SAFETY ISSUE!!!! CONCRETE SLAB CONSTRUCTION SHOULD NOT BE USED UNTIL IT CAN BE DETERMINED THAT IT WILL NOT EXACERBATE STORM SURGE DAMAGE.





From: christianna nelson <christianna.nelson@gmail.com>
Sent: Monday, October 3, 2022 2:54 PM
To: Testimony
Cc: Craig Hammerman; Ida Sanoff; Angela Kravtchenko; rob burstein
Subject: [EXTERNAL] I waited almost 2 hours (without any acknowledgement) to deliver my testimony today...

...and now I have to go pick up my daughter from the school bus. Here's what I wanted to say. I hope you will please share it with the Committee on Resiliency and Waterfronts and Parks and Recreation.

Hi my name is Christianna Nelson and I'm here with the Coney Brighton Boardwalk Alliance. I've been advocating for preserving, protecting and maintaining the wood Coney Island Boardwalk for over ten years now. I'm actually thrilled to hear the Parks Dept talk about resiliency and climate impact mitigation. I'm here to point out that any solution that involves replacing the Coney Island boardwalk with concrete will not add resiliency or protect the surrounding community from the impacts of climate change. Quite the opposite, in fact.

The Riegelmann Boardwalk is an iconic NYC landmark. When I was out gathering petition signatures, early on in our fight, I met people from all over the world who came specifically to see the Boardwalk and they were shocked that the city was even thinking about paving it over. Even more importantly, the Boardwalk is a vital part of the surrounding community. People use it on a daily basis and they have made it clear that they want it to be safe, well-maintained and they want it to be sustainable wood, similar to what was used so beautifully by the Aquarium.

Unfortunately, in the past, the Parks department has seemed to be unwilling to truly listen to the community who uses the Boardwalk and would be most affected by any changes to its structure and materials. They've created "pilot project" after "pilot project" aimed at destroying the Boardwalk piece by piece and avoiding having to do the necessary official environmental impact studies that would be required for a larger-scale plan. But since Superstorm Sandy, we have all seen the very real impact that these choices can have on the people who live in waterfront communities. In short, environmental impact studies are more important than ever.

The Boardwalk itself is not a resiliency barrier for the community. It's part of what needs to be protected. During Superstorm Sandy, the concrete boardwalk structure in the Rockaways was uprooted and pieces of it were carried crashing along in the waves. So concrete is not some magic, indestructable material.

Concrete also has some extremely negative impacts on the community. Concrete exacerbates wave impact and flooding. When a storm surge hits wood, the wood absorbs some of that impact and the boards allow some water to flow through. But when a wave hits concrete, it bounces off this hard, unforgiving material and flows with more power towards the homes, the businesses, and the community streets nearby.

Concrete increases heat in the surrounding community. With global warming, our cities are getting hotter and hotter. Wood absorbs heat and lowers the temperature in the surrounding areas. So why would we want to remove some of the wood that already exists and replace it with more concrete? It makes no sense.

Now, I've heard Parks say many times that the Boardwalk needs to be made of concrete to accommodate vehicles. Sometimes seem to be prioritizing vehicles over people--even building new "on ramps" for these unnecessary vehicles. There are many solutions to the problems that they say require vehicles, which I don't have time to go into here. But other Boardwalk communities are able to remove trash and respond to emergencies without driving gas-guzzling, heavy vehicles over their Boardwalks on a daily basis. We need to change our thinking here.

How about, instead of spending millions of dollars on yet another pilot project that will likely have to be replaced when the Army Corps of Engineers does whatever it's going to do in a few years--how about instead, we require the Parks Dept to hire more than two seasonal carpenters to maintain that beautiful structure we already have? How about we take the time to research environmental impacts before we destroy and replace this beautiful and functional structure--a structure that actually survived Superstorm Sandy? How about we listen to the community?

Thank you. I appreciate you taking the time to listen to what I have to say.

Sincerely,

Christianna Nelson

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 11/17/72

(PLEASE PRINT)

Name: Commissioner Sam Danaher

Address: _____

I represent: NYC Parks

Address: 830 8th Ave, New York, NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 11/17/72

(PLEASE PRINT)

Name: Deputy Commissioner Tom Pedersen

Address: _____

I represent: NYC Parks

Address: 830 8th Ave, New York, NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 11/17/72

(PLEASE PRINT)

Name: Deputy Commissioner P. Tomlinson

Address: _____

I represent: NYC Parks

Address: 830 8th Ave, New York, NY

◆ Please complete this card and return to the Sergeant-at-Arms ◆

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

Name: Debra Greif (PLEASE PRINT)

Address: _____

I represent: me Disability Advocate

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

Name: Christopher D Greif (PLEASE PRINT)

Address: _____

I represent: me Disability Advocate

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 10/3/22

Name: Paul Gallay (PLEASE PRINT)

Address: Railroad Ave Cold Spring, NY

I represent: Columbia Climate School Resilient

Address: 61 Clarendon Ave, NYC 11105 Coastal Communities Project

Please complete this card and return to the Sergeant-at-Arms

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Rebecca Fischman

Address: _____

I represent: NYC MOLEJ

Address: 253 Broadway 14th Fl

Please complete this card and return to the Sergeant-at-Arms

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 10/3/82

(PLEASE PRINT)

Name: Chief of Police Raymond S. Kelly

Address: _____

I represent: NYC Parks

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 10/2/22

(PLEASE PRINT)

Name: Aya Morris

Address: 25 Ford Washington Ave, New York, NY

I represent: Columbia Private School DCC

Address: 61 Chambers St Ave, Rm 830E

New York, NY 10115

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 10/11/22

(PLEASE PRINT)

Name: Assistant Commander Vincent Cicale

Address: _____

I represent: NYC PD 3

Address: 820 4th Ave New York NY

Please complete this card and return to the Sergeant-at-Arms