



# **RISE TO RESILIENCE**

**OUR COMMUNITIES, OUR FUTURE**

## **Waterfront Alliance and the Rise to Resilience Coalition**

### **NYC Comprehensive Waterfront Plan Comments**

**June 11, 2021**

#### **Overview**

Waterfront Alliance and the Rise to Resilience Coalition commend the NYC Department of City Planning for laying out a vision for waterfront and resilience priorities over the next ten years. Our hope is that this document will go beyond spurring conversation, and can help set a firm agenda for the next Mayor of New York City.

The document refers to “plugging remaining gaps and steering this Plan forward” before the Summer 2021 release. One of those gaps is a lack of metrics or timeframes to measure and communicate progress and keep the importance of the Comprehensive Waterfront Plan visible to the public and decision makers. This is particularly relevant as a new Mayoral administration comes into office in January 2022. We encourage adding language to the Comprehensive Waterfront Plan (CWP) that states:

- Every two years the administration – under the guidance of the Waterfront Management Advisory Board – should issue a progress report or “report card.”
- Public workshops at various milestones (i.e. 2 years, 5 years or to be decided) will engage New Yorkers in how the plan is being deployed, as well as provide the new administration with greater opportunity to engage with the plan.

The following are our recommendations, organized by each section of the draft plan.

#### **Climate Resiliency & Adaptation**

##### **We encourage further consideration of the following:**

- Encourage comprehensive climate resiliency planning by committing to developing the Mayor’s Office of Climate Resilience’s (MOCR’s) Climate Adaptation Roadmap into a unifying climate blueprint for the City’s future. A project-based, reactive process is not up

to the sustained challenge that the coming decades present. A unifying 520-mile climate blueprint is essential before making decisions about density or resiliency investments.

- Expedite the work around the Climate Adaptation Roadmap and create a process to impact land use planning that will reflect density in the floodplain. The Adaptation Roadmap should also provide a long-term vision and consistency for how public and private development is built and to what flood resiliency standard in the short, mid-, and long-term. Without this, there is no clear long-term strategy for the resiliency of all communities.
- Take Zoning for Coastal Flood Resiliency and MOCR's Climate Design Guidelines to the next level by creating a model for private developers that incentivizes resilient design. This might include loans, grants, expedited permitting review or other resources. Similar programs have been developed to accelerate provisions in Local Law 97. Property Assessed Clean Energy (PACE) financing is helping to unlock the \$20 billion retrofit market opportunity resulting from NYC's building emissions law. Similar provisions for resiliency should be explored by the City and State.
- A comprehensive climate resiliency plan will need to look beyond resilient design and density limits by identifying and pursuing strategies and tools to discourage or prevent development in areas at high risk of tidal flooding. The draft goals do not call out "managed retreat" by name, rather referring to "housing mobility." The references to "housing mobility" should include greater explanation of how communities would be engaged in these land use conversations.
- Center environmental justice in resilience planning through vulnerability assessments developed in partnership with environmental justice organizations that look at social, demographic, and climate hazards, among other issues.
- Call for increased support and funding for community planning efforts.
- Ensure communities and parts of the City most threatened by climate change are prioritized for all strategies under all goals related to resiliency.
- Provide enhanced resources to the most threatened and underinvested communities, residents, and businesses to build a common understanding of local climate risks
- Ensure small businesses relied upon by communities, and especially those most in the most vulnerable areas that provide essential services after disaster, are included in all principles and goals related to resilience.
- In every part of the draft plan include language that explains and emphasizes the importance of carbon free, off grid, and renewable energy use commitments such as electric ferries, site equipment such as electric trucks, and other site features such as solar panels.

### **Waterfront Public Access**

#### **We encourage further consideration of the following:**

- Prioritize enhancing waterfront access and greenway connectivity among communities with major gaps in these areas. (e.g., Staten Island and Northern Queens).
- Study the inventory of city-owned waterfront properties and conduct assessments on viability for activation and funding. There are many vacant or underutilized publicly

owned sites across the City already being used for waterfront access such as boating or fishing (a case in point being the DCAS parking lot on the North Shore of SI).

- Establish new zoning that incentivizes or requires some public access on industrial sites, building from case studies such as WEDG-verified [McInnis Cement](#) in Hunts Point, Bronx, and [SIMS recycling facility](#) in Brooklyn.
- Leverage industrial maritime history and heritage to promote waterfront access.
- Encourage public resources for educational programming at the water's edge from climate science to recreational programming (e.g. kayaking and swimming).
- Consider infrastructure needed to support public access such as bathrooms, showers, and storage.
- Ensure that opportunities to access the waterfront are inclusive and ADA accessible.
- Ensure the plan better defines the many land uses that are possible for public access such as opening street ends. The plan seems to focus mostly on residential and industrial.
- Ensure that visual access to the waterfront is prioritized in all waterfront development and improvements. Though not as important as public access, visual landscapes are essential for well-being and for waterfront awareness.
- Under Goal 2.3, simply commit to increasing access to public amenities that are most needed such as bathrooms and drinking fountains. Consider the prioritization of bathrooms and drinking fountains as part of resilience strategies as people will be seeking cooler air along the waterfront during high heat days.
- Under Goal 3.1, include before the goal of creating new waterfront community groups better and more robust funding of existing waterfront community groups. Prioritize those community groups that are grassroots and serve underinvested communities and areas of the City.
- Ensure all goals for swimming prioritize the most cost effective and permissible ways to increase access to swimming locations especially in the outer boroughs.
- Prioritize and develop more goals related to reducing and eliminating plastic waste into all waterbodies.

### **Economic Opportunity**

#### **We encourage further consideration of the following:**

- Better emphasize here (and throughout) equity and the need to prioritize and specifically identify historically disinvested Black, Latinx, and low income communities along the waterfront.
- Develop trainings for businesses to show them ways to develop early relationships with community and local job placement programs. Model a program after NYSERDA's job opportunity development program for offshore wind.
- Support development of home resiliency retrofit programs and workforce training, potentially expanding from the following existing programs: NYC Cool Roofs, NYC Accelerator, HomeFix, FloodHelpNY, and others.
- Create grants and partnerships with local workforce development programs led by nonprofit organizations in order to support and expand opportunities for local hires and

serve those most in need, including but not limited to green infrastructure maintenance programs. Emerging sectors like offshore wind should also be targets of workforce training.

- Provide capital investments in offshore wind port infrastructure.
- As NYC recovers from COVID-19, ensure that city agencies like NYC & Co highlight experiences in harbor cruises, recreational boating, historic sailboats, jet skiing, and other maritime experiences. Consider elevating these experiences as “not just for tourists.”
- Leverage historic significance and preservation when repurposing urban waterfronts and encouraging resilience. Redevelopment often ignores the characteristics that make a destination most appealing – its social and economic heritage, unique natural features, and the architectural remnants of earlier eras (i.e. Domino, Gantry State Park).
- Leverage public-private partnerships to create jobs, finance new development, and drive innovation, and ensure that private as well as public projects are investing in/supporting climate resiliency measures and infrastructure investments that benefit the broader community.
- Include and emphasize the economic opportunities at the neighborhood level and community level where commercial activities such as food vendors, local merchants, arts and crafts providers, and education providers at waterfront areas can contribute to economic activity and provide concession services.
- Ensure the City works to eliminate the use of plastic disposables by food and other vendors in waterfront areas.

### **The Working Waterfront**

**We encourage further consideration of the following:**

- Identify key sites along industrial waterfronts that may be primed for Freight NYC initiatives and e-commerce distribution beyond Hunts Points – Newtown Creek, Gowanus, and the Harlem River for example.
- Strengthen and adjust land use measures to balance development and protect industrial business zones (IBZs), significant maritime and industrial areas (SMIAs), and buffer zones. These zones are integral to green and blue maritime jobs.
- Commit to electrification and shore power at cruise terminals.
- Commit to increased focus in NYCEDC on growing the BlueTech innovation cluster.

### **Water Quality & Natural Resources**

**We encourage further consideration of the following:**

- Rezone to protect wetlands. Although significant wetlands are preserved within the city parks system as well as on state and federal lands, many coastal and freshwater wetlands throughout the city are still in private hands or on land under the jurisdiction of other agencies, and remain at great risk of development or degradation. Further, expanding the protection of pathways for wetlands to migrate as sea levels rise is critical.

- Outline specific goals for partnering with and funding existing nonprofit community groups to support citizen science, community bio-blitzes, and waterfront stewardship.
- Develop specific, measurable targets for nature conservation in New York City using some of the recommendations in the recently-launched NYC Wetland Management Framework.
- Incorporate strategies to reduce stormwater point sources, whether by stormwater fee adjustments or overall water reduction strategies for larger buildings.
- Improve practices around water quality monitoring, publish real-time data about water quality, and ensure transparency in water bill cost breakdowns.
- Address current risks of hazardous substance storage sites in floodplains and prevent the siting of power plants and hazardous chemicals near the waterfront, and respond to the risks of such developments.
- Prioritize environmental and natural resources waterfront-based education in all parts of the City with an emphasis on underinvested communities.

## **Ferries**

### **We encourage further consideration of the following:**

- Commit to piloting an electric ferry in the next 3-4 years on a passenger route, not only to Hart Island.
- To meet the growth trajectory outlined in the draft goals, the City must place a greater focus on revenue generation. This could be achieved by, for example, revising ticketing structures, creating new concession opportunities (for example business opportunities at ferry landings), and/or creating advertising opportunities.
- Consider extending ferry service to connect to the City's airports (LaGuardia, JFK).
- Incorporate ferries within the MTA Metrocard system.
- Better highlight the importance of the ferry system and landings for emergency response with the goal of eliminating the challenges that were faced by informal and formal rescue craft during 9/11.

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Rise to Resilience is a campaign and coalition spearheaded by the Waterfront Alliance. We represent residents, leaders in business, labor community and justice, volunteer organizations, scientists, environmental advocates, and design professionals collectively calling on our federal, state, and local governments to make building climate resilience an urgent priority.