



**New York City Planning Commission, Office of Management and Budget, and NYC Parks
Uniform Land Use Review Procedure Hearing: East Side Coastal Resiliency Project
July 31, 2019**

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Good morning, my name is Emily Walker, and I am the Director of Outreach and Programs at New Yorkers for Parks (NY4P). I would like to thank the City Planning Commission, the Office of Management and Budget, and NYC Parks for holding this hearing today, and for considering the public's testimony on this important project.

We want to begin by stating that we understand the challenges that face the City as it seeks to balance the complex engineering needs of this project with the realities of the location itself. East River Park has just one point of entry for vehicles. It is adjacent to thousands of units of middle-income and NYCHA housing. The park abuts the 14th Street ConEdison facility. Lastly, it is surrounded by a major highway on one side and a large river on the other. To that end, we can especially appreciate that the City has sought ways to mitigate the quality of life issues related to construction that will impact the thousands of New Yorkers who live alongside this stretch of the East River. We also understand that it is not a matter of "if" the next Superstorm Sandy happens, but "when". The need to revitalize East River Park as a public open space that can also offer flood protection is urgent and essential to the protection of residents of the East Village and Lower East Side.

When it was first made clear that the City's design and construction approach to the East Side Coastal Resiliency Project was significantly different than expected, NY4P expressed concern for the lack of transparency in the process. Community members who gave years of input into the redesign of the park felt rightfully slighted by the sudden change in plans. We are encouraged by the steps the City has taken since January, when the City Council held an oversight hearing attended by hundreds of residents who testified about this project. We still believe there is ample room for the City to consider the needs and feedback of residents as this project moves through ULURP.

While the City has committed resources to provide some level of mitigation for the temporary loss of this vital park space for the East Village and Lower East Side communities, we think more can be done to promote and publicize these investments and open space improvements. We encourage strong interagency coordination on these mitigation measures in particular. While we know physical improvements to other NYC Parks properties in the community will happen and will be vital to absorbing displaced park users, we recommend that NYC Parks work closely with agency partners at the New York City Housing Authority (NYCHA), the Department of Education (NYCDOE), and the Department of Transportation (NYCDOT) to find additional opportunities to provide mitigation for this sizeable interruption to neighborhood park use. NYCHA and the DOE hold jurisdiction over land parcels that can provide public access proximate to what traditional parks

provide to communities. NYC Parks must be clear and intentional as it partners with these agencies. Plans to improve spaces on school and public housing grounds must be shared widely and publicly, and should include committed funding for physical improvements and ongoing maintenance for these spaces. It will be essential for NYC Parks to share best practices and resources to ensure that non-Parks, City-owned properties are kept to the highest standard of care.

Additional coordination and consideration will be needed to accommodate people on bicycles, who currently use East River Park's protected pathway. NYCDO'T must plan a safe alternative route for this use, especially as many New Yorkers and visitors rely on East River Park as a safe, car-free thoroughfare along the East Side of Manhattan. It will be essential to provide a reasonable, safe route for these cyclists to use during the period of construction, and we urge NYCDO'T to work with transit advocates and the bicycling community to appropriately plan for these changes.

NYC Parks has made clear its commitment to neighborhood-wide street tree plantings and bioswale installations as mitigation for the total loss of tree canopy in East River Park. While we commend this plan as an important infrastructure change that will provide improvements for the communities upland of the park, we would urge that the City dedicate increased maintenance funds and resources to specifically care for these new plantings. The first few years of life for new street trees are also their most vulnerable, with a certain amount of tree mortality expected in new plantings. While standard tree-planting contracts require that contractors replace dead trees within two years of their planting, essentially accepting a level of failure, we hope that the City will take a more proactive maintenance and care approach for the new tree plantings in these communities. Given that these neighborhoods lost so many trees from Sandy's floodwaters, and will be losing the entire existing canopy within East River Park, we believe the City should have a stronger maintenance and care contract in place for these plantings, to ensure that the new street tree mortality rate is as minimal as possible.

Finally, one of NY4P's weightiest concerns relating to public open space and parks will always be the question of long-term maintenance. For too long, New York City has failed to dedicate permanent and meaningful funding for baselined, year-round maintenance and operations staff lines. We were encouraged by the investments made by the City in the FY20 budget, but we know many of those positions are still not permanent, and will not meet the sum of tremendous needs of our parks system. As we contemplate a park renovation and rebuild on the scale, and at the cost, of the East Side Coastal Resiliency Project, we believe it is crucial that the City step up and make permanent the maintenance positions needed to provide day-to-day upkeep in parks throughout the impacted communities during construction, and that robust maintenance and horticultural staff are added and baselined to help maintain East River Park when it reopens. Simply put, maintenance is a matter of protecting our capital investments, and we think any conversation about a \$1.4 billion dollar construction project is a nonstarter without an appropriate, permanent commitment to more full-time maintenance and operations staff.

Thank you very much for the opportunity to speak. I welcome any questions you may have.

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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.
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