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Gale A. Brewer, Borough President

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Department of City Planning
120 Broadway, 31st Floor
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October 16, 2019

Re: Comments on the Final Environmental Impact Statement for the East Side Coastal Resiliency Project, CEQR No. 15DPR013M, ULURP Applications C190357PQM and N190356ZRM

To Director Abinader,

I am pleased to submit these comments for the Final Environmental Impact Statement (FEIS) of the East Side Coastal Resiliency Project. The New York City Departments of Transportation (DOT), Citywide Administrative Services (DCAS), Environmental Protection (DEP), and Small Business Services (SBS) (collectively the “Applicants” or the “City”) are seeking two ULURP approvals for (1) acquisitions of non-City owned property and (2) text amendments to the New York City Zoning Resolution (“ZR”) §62-50 “General Requirements for Visual Corridors and Waterfront Public Access Areas” and § 62-60 “Design Requirements for Waterfront Public Access Areas” to facilitate the East Side Coastal Resiliency (ESCR) Project (the “Proposed Project”). The Proposed Project aims to address coastal flooding vulnerability in lower Manhattan by implementing a system that includes floodwalls, underground sewer upgrades, and the raising of the John V. Lindsay East River Park (East River Park) out of the 100-year floodplain. These FEIS comments relate to the project plan for Design Alternative 4 (the “Preferred Alternative.”)

Open Space, Access and Phased Construction

The latest FEIS released on September 13, 2019 does not include the City’s announcement on October 2, 2019 that the Proposed Project will be phased through 5 years of construction, with the Proposed Project’s flood protection to be completed in mid-2023 and the entire Project completed by the end of 2025. While I appreciate that the City has taken into consideration the agreement to not fully close East River Park during the duration of construction, the news came too late for robust community review and input. In fact, the news to agree to project phasing came only one day before the application’s New York City Council Subcommittee on Landmarks, Public Sitings and Dispositions public hearing held on October 3, 2019. The late reveal of the Project’s new phasing schedule does not instill community trust in the City whose choice of the “preferred alternative” came after little or no engagement with the community after 3 years of input about the previous design.

In order to complete construction by the end of 2025 I urge the city to take into account all conditions that could hinder the Project’s timely completion, such as weather and storm related delays. This includes the

need to install Interim Flood Protection Measures (IFPM) to both protect the community from flooding during construction as well as the construction site and equipment.

Interim Flood Protection Measures (IFPM)

In a letter to my office dated August 5, 2019, the City responded that products employed for IFPM, such as HESCO barriers and Tiger Dams, “are designed for more frequent, but less severe storms, and cannot provide sufficient protection against Sandy-level storm surges.... In addition, deploying IFPMs would also complicate and slow construction of ESCR and its critical neighborhood protections.”

If the City intends to maintain its timeline for Project completion, it must (1) consider the employment of IFPM products to protect the construction site and community in the event of a storm surge. (2) The city must provide the community with its rationale for leaving the shoreline completely unprotected during construction. While the City has mentioned that the installation of HESCO barriers and Tiger Dams would complicate and slow construction of ESCR, there are other alternative IFPM products that could be installed.

For example, in a Community Board 1(CB1) meeting with members of the Mayor’s Office of Resiliency and the Office of Emergency Management, it was reported that the use of “AquaFences” was planned as part of the South Battery Park City Resiliency Project. A product like AquaFence could provide sufficient protection against Sandy-level storm surges, as evidenced by their planned deployment in front of major corporate headquarters that are close to the waterfront, such as at One World Trade Center and 180 Maiden Lane. In addition, the deployment of AquaFences by local labor wouldn’t occur until 3-4 days ahead of a severe weather warning and do not require fill materials, thereby neither complicating nor appreciably slowing down construction of ESCR. AquaFences are available in 4, 5, 6, and 8 feet high by 3 feet wide panels. The City has already invested and planned for the storage of the AquaFences at warehouses in Long Island City, Brooklyn, and New Jersey. In addition, AquaFences will soon be replacing HESCO barriers borough wide

It would be wise for the City to invest in IFPMs that best suit ESCR’s needs and alternative products aside from HESCO barriers and Tiger Dams should be investigated. A product such as the AquaFence with its flexible installation could be well suited for the Project’s siting and construction timeline. The City cannot predict that a Hurricane-Sandy scale storm and flooding would not occur during the 5 years of ESCR’s construction. As such, ignoring the value of IFPMs to ensure that the construction timeline does not stretch even further out due to storm impacts is a risky and potentially very costly course for the city.

Process, Coordination and Public Participation

As I noted above, the agreement not to phase construction came only one day before the application’s New York City Council Subcommittee public hearing held on October 3, 2019. I strongly urge that the Applicants henceforth inform and engage the community well in advance of changes in plan. Since the submission of my comments on the Project’s Draft Environmental Impact Statement (DEIS) nearly three months ago on July 30, 2019, the City still has taken no action to create the Community Advisory Group that would consist of appointees from the Community Boards, City Council Members, and the Borough President’s office. This forum is intended to provide input and advise the community through all phases of the project.

According to the Applicants, the agencies representing ESCR have reached out to the public and stakeholders through 45 community engagement meetings since 2015. They have used flyers, e-communications, open houses, and websites. The applicants also opened a 52-day comment period in 2015 to receive oral and written testimony that was then posted on the project website. In addition, details

were made available in 4 languages, and representatives of New York City Department of Parks & Recreation (NYC Parks) and the New York City Department of Design and Construction (NYC DDC) attended various CB3 and CB6 meetings to present changes to the project.

After the Design Alternative 3 was rejected by CB3 and CB6 in 2018, the Applicants and the City went ahead to make major design changes without any community input. The result is Design Alternative 4, or the “Preferred Alternative.” In response CB3 wrote, “For many in the community, the ESCR process since fall 2018 has frayed trust in government and public agencies because of the drastic change in plan design done without community consultation, despite the needs of the community who look to their government to supply desperately needed protection of their lives and homes, (and often both).”

Residents and community members must be fully informed and active participants in oversight of the project. It is imperative that as this project moves forward, the ESCR team regularly consults with the Community Advisory Group, including CB3 and CB6. In addition to coordination with the Community Advisory Board the Applicants must be transparent in their decision making and communicate about design and timeline progress using social media, community meetings, open houses and information sessions in several languages including Spanish, Mandarin, and Cantonese. These steps are basic to building trust in the ESCR process.

There must also be a strong emphasis on outreach to residents of the NYCHA campuses. There are approximately 28,000 NYCHA residents living in the area adjacent to the proposed project, of an estimated total population of 198,549. The goal of the ESCR resiliency project is to benefit and protect all members of the community. The project scope declares that no communities of color or low-income communities would be disproportionately affected. However, families living adjacent to the project site are worried that children will play there. The applicants must ensure that the construction areas are secure and that neighbors are given adequate notice about road and area closures.

The application does not mention specific negotiations with any property owners who would be affected by the proposed acquisitions of easements. It is imperative that the Applicants conduct outreach to all property owners with detailed information concerning the proposed easements and respond in a timely manner to the questions, concerns, and rights of these owners. Furthermore, any and all businesses and non-profits within the East River Park that are directly impacted or displaced by the construction of the ESCR project must be offered relocation assistance by the Applicants.

Independent Environmental Review

In August 2019, I along with Council Member Carlina Rivera hired an independent non-New York based environmental consultant to review the ESCR project and its environmental impacts. The review was led by Dr. Hans Gehrels of Deltares, a Netherlands-based environmental consulting group. He visited New York City during the week of September 9th, 2019 to gather facts and conduct his review.

During his stay, Dr. Gehrels met with a number of community stakeholders including but not limited to members of the Lower East Side Ecology Center, NYCHA tenant associations, non-profits, and sports teams, as well as elected officials, CB 3 and CB6 representatives, members of the Mayor’s Community Affairs Unit, Office of Recovery and Resiliency, and Intergovernmental Affairs, the Department of Design and Construction, the Department of Parks and Recreation, and other third party entities.

Dr. Gehrels’ report summarizes the following main points that I urge the City to take into consideration:

- Transparency of the City decision-making process and release of documentation that was used in the decision-making process, such as technical studies, hydraulic and geotechnical field surveys and/or modeling, and detailed mitigation plans for the construction period;

- The establishment of a community advisory group;
- Monitoring of air quality, soil quality, dust, noise, and vibration during construction; monitoring reports should be made available online for public review;
- Installation of IFPMs during construction;
- Conducting a hydraulic study in the areas north of the Project that do not have a connecting flood protection system to gauge whether additional measures are needed in that area;
- Phased construction of the park and steps to ensure sufficient alternative active and passive open-space recreational resources;
- Adding two feet of fill in the current project, rather than leaving it as a future option;
- Conducting a study of future transportation scenarios for the FDR Drive, including green decking the Drive;
- Conducting a study on urban flooding as part of the City's green infrastructure program; and
- Conducting a geohydrological and geotechnical study on shallow groundwater dynamics in the part of the project area around the East Village that is susceptible to basement flooding and basement leakage.

Alternative Locations for Active and Passive Uses

My office met with a number of local youth leagues that utilize East River Park's sports facilities. Even with the new project phasing, removing these facilities from public use would create a financial and physical hardship for sports teams that will have to commute to sports fields outside of their neighborhood during the 5 years of closures. The Applicants must work with all local youth sports leagues to identify alternative facilities and identify transportation to these sites. At the completion of the project, the Applicants are to guarantee field priority for local youth leagues.

The FEIS states that "NYC Parks is exploring providing alternative recreational opportunities throughout the Lower East Side neighborhood through programs like Shape-Up classes, walking clubs, Arts, greening programs, etc." (8.0-4). It is vital that the location and funding for these programs are disclosed and discussed with the CBs and the Community Advisory Group to ensure financial feasibility and value to residents. Suggestions for alternative recreational space include Basketball City; expanding the NYC Summer Streets program; activating the underutilized spaces of Waterside Pier; use of a temporary space on the top level of the Skyport Marina parking garage; the use of temporary barges anchored off of the existing park; and potentially "green decking" underused spaces such as the Allen Street Malls, the vacant Allen Street building, and beneath the Williamsburg Bridge.

I support further research into options for "green decking," the installation of temporary, synthetic turf, and further research for renovations proposed by the Applicants at a number of alternative sites, such as installing new sports coating at Tanahey; Sara D. Roosevelt; Al Smith Recreational Center and Playground; St. Vartans; Columbus Park; and Coleman Playground; converting the Baruch Bathhouse to a community space; and painting playgrounds and park equipment at approximately 16 sites by Spring 2020. However, it is imperative that the installation of turf and other renovations be brought to their respective CBs for community input and approval. Recently, the replacement of an asphalt lot with synthetic turf in Tompkins Square Park's northwest corner ignited a dispute between NYC Parks and the skateboarders that regularly use that patch of asphalt. I ask that 1) the Applicants conduct robust

community outreach to mitigate such disputes before finalizing design decisions for temporary, alternative spaces, and 2) that a finalized proposal, map, and timeline for the closure and opening of all proposed, alternative spaces be published for public comment well in advance of implementation.

Before the first summer season of the East River Park's closure, temporary water parks or water play features must be made available. Cooling centers and comfort stations in the project area- specifically, at Murphy Brother's Playground- must be included in the final design and the decision to include them not deferred to a later time.

Urban Design and Visual Resources

NYC Parks manages an "Art in the Parks" program that collaborates with a diverse group of arts organizations and artists to bring temporary installations to many park locations, including the East River Park. While I am confident that NYC Parks will continue this program after completion, of the ESCR project, some art works were not created as part of the "Art in the Parks" program will be demolished, and others not returned to the completed park. The City has promised to preserve and relocate the 27 animal sculptures at the John V. Lindsay Playground. The sculptures were commissioned in 2002 and include 18 larger-than-life size seals and 9 turtles and crabs that have brought enjoyment to visitors for over 17 years. Up until June 20, 2019, the sculptor was left unaware and was not notified by the Applicants that his sculptures were excluded from the new design of East River Park and would therefore be demolished.

While this artist's work will not be saved and relocated, I urge that NYC Parks, the NYC DDC, and the Applicants conduct a public study of all existing art pieces in the project area that would be affected by ESCR's construction and immediately contact all artists about the future of their work. NYC Parks, NYC DDC, and the Applicants must strive to include these permanent installations as part of ESCR's new landscaping and design. Should an artists' work be excluded from the ESCR design, each artist should either be commissioned for new work and/or generously compensated for the removal of their valued pieces. No pre-existing artworks are to be demolished during construction; instead they must be moved off-site through consultation with the artist.

While Design Alternative 3 and the Preferred Alternative both meet the minimum levels of protection for 2050 sea level rise, I urge the Applicants to consider the future of both designs beyond 2050 with regards to sea level rise and the East River Park's relationship to the FDR. I recommend that the Applicants conduct a study of the benefits and scenarios of green decking or burying the FDR below ground, the adding of 1-2 feet of additional height of the present Preferred Alternative design so as to not remove trees again in the future, or adding height to the floodwall in the Alternative 3 design.

Historic and Cultural Resources

On April 3rd, 2019, I sent a letter to NYC Parks and NYC DDC regarding East River Park's Fireboat House, which serves as the headquarters for the LES Ecology Center. The LES Ecology Center has played an invaluable social and educational role in East River Park, the surrounding neighborhoods, and the Borough of Manhattan as a whole. Since 1998, when their headquarters moved to the Fireboat House, they have acted as key stewards for the park. Since our letter and the submission of my comments on the DEIS on July 30, 2019, there have been no commitments on the part of the City to reconstruct and raise the Fireboat House out of the 2050 floodplain. The City has cited that the age of the building's pilings prevent re-construction above the floodplain. However, there has been no detailed rationale provided to the public for how the project team came to that conclusion.

By comparison, the Solar One Center is being completely rebuilt above the 2050 floodplain. I believe that the same could be done for the Fireboat House. The scale of construction for the rebuilding of East River Park must not exclude the opportunity to preserve the Fireboat House and the LES Ecology Center while providing new spaces for programming and sorely needed public restrooms. This new construction would also provide the opportunity to expand the existing NYC Parks' storage space. NYC Parks and the NYC DDC must make commitments to provide displacement and relocation support to the LES Ecology Center prior to and during the closure of East River Park.

Natural Resources

The Preferred Alternative has the potential to result in adverse impacts on tidal wetlands overseen by the New York State Department of Environmental Conservation due to the installation of support shafts and footings. In-water work and construction delivery barges would affect surface water resources as well as several aquatic species including winter herring and striped bass, as well as the two identified endangered species, the Shortnose sturgeon and the Atlantic sturgeon. The removal of as many as 991 trees (819 of which are located within East River Park) during construction represents a loss of habitat for insects and migratory birds. It is estimated that 775,000 cubic yards of fill will be required for the construction. All fill used in the construction of this project must be clean fill that has met the criteria for the Soil and Groundwater Management Plan (SGMP) and been approved by the Department of Environmental (DEP) protection. In addition, the collection and conveyance of storm water should not result in the erosion, instability, or compositional changes to geology or soils.

A more in-depth review should be conducted of the ESCR project's impact upon wildlife and plant species, as well as bird and insect migration during and after construction; we cannot rely on the notion that species will naturally return to East River Park when the project is completed. The Applicants must work with park stewards such as those from the LES Ecology Center and the Solar One Center to identify and protect biodiversity during and after construction.

NYC Parks "is exploring a Lower East Side Greening program with the opportunity to plant up to 1,000 trees in parks and streets, and create up to 40 bioswales" starting in fall of 2019. Through this program, NYC Parks must work with local community organizations, CB3 and CB6 to conduct tree planting and tree guard installation operations, including the creation of concrete plans for the care of the trees. In February 2019, CB3 passed a resolution to support the proposal of a LES Community Tree Canopy Initiative that would communicate with NYC Parks regarding when and where the proposed trees will be planted and how they will be maintained. The Applicants must immediately create these additional bioswales, tree canopy plantings, and permeable pavers as temporary mitigations against dust, local flooding, and adverse weather conditions during construction. While 991 trees will be removed during construction, 1,815 new trees will be added into the new landscaped park. The use of a variety of topsoil and salt resistant indigenous plants in the re-establishment of passive areas in the park must be included in the project's mitigation efforts.

Construction

The FEIS mentions that construction workers will be on site from 7:00am to 6:00pm on weekdays with the possibility of expanded hours to meet deadlines. Nevertheless, the City should not depend on after hour's construction as a regular occurrence, and all permit applications for afterhours construction must be shared with the Community Advisory Group and go through Community Board review.

The Applicants must apply and qualify for an Envision Certification from the Institute of Sustainable Infrastructure to ensure sustainable construction standards, in addition to the following suggested mitigations:

- Hazardous Materials

The FEIS confirms that subsurface contamination and sources of petroleum waste consistent with historical Manufactured Gas Plants (MGPs) were found in the soil and the groundwater in the project area. Other hazardous materials found include asbestos and lead-based paint, byproducts of gas production (i.e. coal tar, fuel, and gasoline, Volatile Organic Compounds (VOCs), pesticides, herbicides, and rodenticides, and metals) from the auto repair shops, gas stations, and the Con Ed Station located in and near the project area. Flood protection must be provided for these existing hazardous deposits in and near the project area that may be affected by storms.

In an effort to reduce the potential of MGP-related contamination, a series of MGP-related recovery wells are to be installed prior to the project's construction. Structural construction of the Pier 42 project, the flood protection system on the west and east side of the FDR Drive, and the reconstruction of the Solar One Center would involve demolition and excavation activities that have the potential to disturb subsurface hazardous materials.

All VOCs, petroleum storage tanks, and other hazardous materials must be removed from affected sites in accordance with federal, state and local regulations prior to project construction. Further investigations in the form of an asbestos survey, Site Management Plans, a Mitigation Work Plan, a Remedial Action Plan and a Construction Health and Safety Plan shall be included in the FEIS. The subsurface investigation shall be conducted in conjunction with the DEP. No construction and occupancy permits should be issued until DEP receives, reviews, and approves the findings a Remedial Closure Report certified by a New York licensed professional engineer.

- Energy

The Preferred Alternative will require excavation, pile driving, and other disruptive construction activities in and around existing energy transmission and generation infrastructural sites, such as the Con Ed Station. To avoid significant damage and service disruptions, construction plans must fully protect the existing water, electrical and high voltage electrical transmission lines that extend beneath the entire length of East River Park. Construction must aim to minimize vibration and use excavation practices, including the proper placement of fill and soil, which ensure that there shall be no disruption of vital infrastructure that serves the surrounding community.

- Air Quality

The FEIS states that Design Alternative 4 will generate a total of 10,594 metric tons of CO₂e from passenger vehicles, trucks, and tug boats (during deliveries by barge). Total on-site emissions are 16,657 metric tons Co₂e for non-road and on-site truck idling.

Construction equipment must use building materials with low carbon intensity and ultra-low-sulfur diesel or biodiesel blends of 20 percent (B20) exclusively for all diesel engines. In addition, a dust control plan (including a watering program) must be ensured. Truck idling time must be restricted to 3 minutes except for vehicles using their engines to load, unload, or process materials.

Electrically powered equipment must be used in lieu of diesel-powered equipment whenever feasible. These requirements for the reduction of emissions from construction equipment and idling vehicles should be enforced as part of an integrated approach to environmentally-friendly construction practices in all aspects of the project, including the required use of recycled steel, aluminum; systematic methods to reduce construction waste; and strict adherence to all applicable environmental regulations to protect water, air, and soil quality during the excavation and removal of contaminated soil and materials, the deposition of land fill, and all construction

practices at the site; and these requirements must be stipulated in all RFPs, agreements, and contracts for work on the ESCR project.

- Noise

Prior to the start of work RFPs and bids must specify that all contractors will use vehicles and equipment designed for noise mitigation throughout the construction period. This includes the use of a hydraulic press in pile installation; hanging noise barriers or curtains made from mass-loaded vinyl around the pile driving to reduce noise impacts; enclosing the concrete pump and mixer trucks [whenever the mixer barrels are spinning] in a roofed shed or tunnel facing away from residential areas; and using barging instead of trucks for deliveries of construction materials, whenever feasible.

According to the Applicants, night and weekend work will likely occur. Because of the residential character of the areas adjacent to the project site, the Applicants must ensure that construction noise be minimized and closely monitored. Work within 50 feet of a residence must not exceed a noise level of 80 dBA. Pile driving should be limited to regular work hours, and when within 50 feet of a residence not exceed 80 dBA. For purposes of comparison, 80 dBA is equivalent to the noise level when using a blender, coffee grinder, or in-sink garbage disposal- a volume that when heard in a home at night or in a school classroom would be extremely disruptive. For example, in school settings the CEQR Technical Manual recommends a maximum noise level of 45 dBA. When night work is required, all vehicles and machinery in use must be equipped with noise mitigation.

The Applicants must inform the affected communities and CBs well in advance of the dates of all night work, and must obtain the proper after-hour work variances from the New York City Department of Buildings (DOB). All construction-related and scaffolding-related permits must be obtained from the DOB and the CBs notified in a timely manner.

- Water and Sewage Infrastructure

All water and sewer infrastructure construction is to comply with federal, state and city regulations such as the Clean Water Act and combined sewer overflow regulations. While the FEIS states that, “if a storm is forecast, the sewer system would be inspected and cleaned as needed,” it is imperative that there be routine checks on these systems, not only when the risk of flooding is imminent.

While the new parallel conveyance system is intended to limit flooding from storm surges within the study area, the design does not address the risk of increased flooding outside of the protected area (“bath tubs”), for example at East 25th north of the end of the proposed flood barrier. This includes the area of Asser Levy Park, where NYC DDC plans to build a flood-control wall and a sliding gate that would protect the landmarked Asser Levy Recreation Center. However, this proposal would leave the playing fields unprotected, and East 25th Street susceptible to tidal surge and flooding. Due to these design considerations, it is imperative that the Applicants agree to renovate and rehabilitate the unprotected playing fields at Asser Levy Park in the event of a disaster, since they have been excluded from protection of the ESCR project.

Transportation

During the construction phase, the East River Greenway would be closed from East 23rd Street to Montgomery Street. Bicyclists will be re-routed to the on-street bike network, primarily the protected bicycle lanes along First and Second Avenues as well as those on Allen Street/Pike Street and Clinton

Street. The project will require rerouting of the East River bikeway/walkway to inland routes, resulting in significant adverse effects for bikers and pedestrians. According to the DOT, the bikeway/walkway “carried 2,077 cyclists on weekdays and 1,974 cyclists on weekends during daylight hours in 2018, numbers that were expected to rise by 5% annually.”¹ DOT and the Applicants must ensure that the rerouting of the bikeway/walkway to Avenues A, B, C, or D will result in an equally safe, protected, and well-signed route.

The Preferred Alternative would generate significant local increases in traffic: 251 passenger car equivalents (PCEs) during the 6 to 7AM peak hour, and 131 PCEs during the 3 to 4PM peak. These exceed the CEQR Technical Manual analysis threshold of 50 vehicle trips. In particular, the intersection of East 23rd Street at First Avenue and those along Avenue C are projected to be heavily impacted during AM peak hours.

Parking issues also pose a problem. A survey of the ¼-mile radius of the project area identified 70 on-street parking spaces and 60 off-street spaces available near Project Area One, and 30 on-street parking spaces and 800 off-street spaces near Project Area Two. Construction under the Preferred Alternative is anticipated to generate a maximum parking demand of 92 spaces for Project Area One, and 52 spaces for Project Area Two, significantly exceeding existing availability. Compounding this problem, fifty off-street parking spaces could be temporarily displaced during construction at the East River Housing Corporation surface parking lot. Project Area One may have a parking shortfall of up to approximately 35 spaces. The Applicant must anticipate this shortfall and the congestion it will create, and plan for the impact to on and off-street parking in streets beyond the ¼-mile radius of the study.

I make the following recommendations:

(1) signal timing changes should be implemented at the intersections of East 23rd Street/First Avenue and East 23rd Street/Second Avenue to mitigate adverse traffic effects; (2) DOT plan addressing the narrow lanes of traffic on East 20th Street during the construction of the interceptor gate house must be submitted for CB6 approval; (3) a new crosswalk must be added at the intersection of Avenue C and the north side of the FDR Drive’s Exit 7 to create a more direct, pedestrian access pathway across Avenue C to the waterfront and Stuyvesant Cove Ferry Landing; (4) the exit ramp from the FDR must be modified to provide a legal left turn onto Avenue C at the East 8th street traffic signal, with appropriate signage for improved pedestrian safety.

Based on the latest available U.S. Census data (2000) for workers in the construction and excavation industries, it can be expected that 48% of construction workers will commute to the project site by private vehicle at an average occupancy of approximately 1.30 persons per vehicle. The FEIS estimates the presence of a maximum of 250 average daily construction workers for Project Area One and a maximum of 140 average daily construction workers in Project Area Two. Parking for construction workers must not further impact reduced street parking for residents. Parking space must be provided within unused areas of the construction site or at other off-street parking sites. Similarly, the 2000 Census states that approximately 46% of construction workers commute to work via mass transit. As the project area is well served by mass transit, including 6 subway lines (No. 6, and F, J, M, Z, and L) and numerous local and express bus routes, the Applicants can further reduce parking by workers by offering them a reduced transit fare on work days.

¹ <http://www.nyc.gov/html/dot/downloads/pdf/cycling-in-the-city.pdf>

NYC DDC's have stated that pedestrian access to Corlears Hook Ferry Station in CB3 and the Stuyvesant Cove Ferry Station in CB6 will be maintained during the period of construction. According to the NYC Ferry Quarterly Update (2019) for the first quarter, average weekday ridership for the Lower East Side route which stops at both the Corlears Hook and Stuyvesant Cove Ferry Stations include 748 persons and 326 persons on weekends.² NYC DDC and related agencies must verify that safe and convenient pedestrian access to both ferry stations is maintained during construction. If disruptions prove unavoidable, the CBs and ferry users must be notified well in advance.

A study of traffic volumes and patterns prior to a storm major event should be undertaken approved by the CBs. This study must include information on potential road closures or blockage, the availability of public transit, parking restrictions, and evacuation scenarios for residents and businesses in the vicinity.

Public Health and Safety

The Community Construction Liaisons managed and staffed by a Borough Outreach Coordinator from pre-construction through the project's completion are intended to serve as direct community contacts. They must be available 24/7 through a dedicated hotline and email to report unsafe conditions and log complaints and concerns. The information for this hotline and email must be posted prominently on the construction sites, on social media, the CBs, local elected officials, and on the websites of all involved agencies.

All workers who maintain and repair the floodwall infrastructure and parallel conveyance system must receive thorough training and be provided with a safety manual. As flood gates will be closed manually before storm events, I urge the Applicants to conduct a study on ways to ensure the proper training and safety of all workers involved in storm preparation and the operation of the flood control systems.

Inquiries about these comments on the FEIS should be addressed to Stephanie Chan, Urban Planner at schan@manhattanbp.nyc.gov or at 212-669-8168. Thank you.



Gale A. Brewer
Manhattan Borough President

² <https://www.ferry.nyc/wp-content/uploads/2019/05/NYC-Ferry-2019-Q1-Quarterly-Update.pdf>