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October 3, 2019

MAS Comments to New York City Council on the East Side Coastal Resiliency Project, CEQR No. 15DPR013M, ULURP Applications C190357PQM & N190356ZRM

The Municipal Art Society (MAS) believes the East Side Coastal Resiliency Project (ESCR) should set a standard for how long-term, large-scale resiliency projects are planned, coordinated, and implemented in New York City and elsewhere. While we recognize the challenges of coordinating a project of this magnitude, protecting the East River community requires more thorough, efficient, and engaged planning than has occurred thus far.

While we were pleased with the announcement that project construction will be phased, one of our chief concerns, this significant last-minute change speaks volumes about the need for better planning. ESCR must include more adequate mitigation measures to address impacts during construction, details on how the project would integrate with other coastal resiliency plans, and true community input in its planning and design.

The importance of East River Park, surrounding playgrounds, and river access cannot be overstated. The area is grossly underserved by open space, with only a third of the city average. Twenty-one percent of area residents are below poverty level, and 17 percent are elderly. We maintain that the City must work with DPR, DOE, NYCHA, community groups, and non-profits on a more comprehensive, long-term plan for new open space after ESCR is complete.

The FEIS does not adequately address our concerns about how the Fireboat House would be preserved during construction, whether it would be used during this time or after project completion, and how it would be protected from flooding in the future. We expect these and our other concerns to be addressed in a revised FEIS.

Because of their shared purpose, proximity, and permitting and construction timelines, MAS believes that ESCR and the Lower Manhattan Coastal Resiliency Project should be evaluated together. This effort should address connectivity of the waterfront esplanade, infrastructural tie-in points, cumulative impacts, and comparative levels of flood protection.

Finally, as we have maintained throughout the process, the success of ESCR will depend on how well the City engages with the community and responds to its needs. MAS agrees with the recommendations from the Manhattan Borough President that a task force be formed to coordinate the effort.

We urge the City to address our comments and create a true model for integrating coastal protection into urban neighborhoods. Thank you for the opportunity to speak.