

## **LESReady! Lower East Side Long Term Recovery Group – Public Comments East Side Coastal Resiliency Project, Amendment 13**

In 2012, Hurricane Sandy exposed many of the underlying resiliency issues in the Lower East Side. Home to the biggest concentration of public housing in Manhattan, the Lower East Side holds several multi-family high rise buildings on the waterfront. These buildings, like much of the Lower East Side, reside on infill atop of former marshlands that place much of our community in the flood zone. Combined with aging infrastructure, Con Edison’s 14th St Power Plant and the 13th St pumping station, and the constant forces of displacement, Lower East Side residents face many resiliency challenges. In March 2013, the Lower East Side Long Term Recover Group (LESReady!) formed to respond to aftermath of Hurricane Sandy and to prepare a coordinated response in the event of future disasters.

LESReady! is a coalition of community groups and institutions that will cooperatively coordinate our response, resources, preparedness planning and training in the event of future disasters. Our work focuses on Manhattan’s Community Board 3 area and the immediately adjacent neighborhoods that our groups may serve. In addition to planning for disasters, LESReady! is committed to fostering an equitable, sustainable, climate-resilient Lower East Side.

The long, difficult work of adapting to climate change is an effort being undertaken most urgently and most creatively by cities. Urban areas, in their acknowledgement of the problem and their determination to mitigate it, have become leaders in sustainability and resilience, and New York in particular stands out in this regard.

We commend the various public and private agencies involved in the East Side Coastal Resiliency (ESCR) and other climate-related projects for their commitment to combating climate change. As a coalition with deep roots in the community, we also value the inclusive, participatory way in which this project has, so far, been carried out.

That being said, a number of items in the Proposed Substantial Action Plan Amendment 13 stand out to us as warranting more attention; these include concerns related to climate and sea level rise projections beyond 2050, and possible development pressures generated by the ESCR project.

### **LESReady! Member Organizations**

- 9BC Tompkins Sq. Block Association
- All the way E. 4th St Block Association
- American Red Cross
- Catholic Charities
- Charles B. Wang Community Health Center
- Chinese Progressive Association
- Chinese-American Planning Council
- Cooper Square Committee
- East Side Tabernacle
- Good Old Lower East Side, Inc.
- Grand St. Settlement
- Green Map System
- Hamilton Madison House
- Henry Street Settlement
- Lower East Side Coalition Housing Development, Inc
- Lower East Side Power Partnership
- Manhattan Community Board 3
- Nazareth Housing Inc.
- New York Disaster Interfaith Services
- Occupy Sandy
- Ryan-NENA Community Health Center
- Sixth Street Community Center
- The Salvation Army
- Two Bridges Neighborhood Council
- University Settlement
- Village East Towers Emergency Preparedness Task Force
- WiFi- NY

## ***Climate Concerns***

It was prudent of the City to take the NPCC's 90<sup>th</sup> Percentile (High Estimate) sea level rise projections into account when designing the ESCR. Sea level rise, however, is projected to not only continue, but accelerate in the future<sup>i</sup> unless substantial decarbonization efforts are implemented worldwide. A recent report by the National Oceanic and Atmospheric Administration estimates that global sea level rise could rise faster than previously predicted, and will likely be worse for the Northeast given ocean currents, wind patterns and settling sediments.<sup>ii</sup> Furthermore, given the current federal administration's regressive climate policies, policy and climate groups predict US greenhouse gas emissions will remain stagnant and not lower as necessary to meet global greenhouse gas emissions reductions.<sup>iii</sup> Given the uncertainty that substantial emissions reductions measures will be taken, New York must be prepared for a future of rising seas well above 2.5 feet.

The Benefit-Cost Analysis notes that the ESCR's project useful life is expected to be 50 years, or possibly longer with proper maintenance (BCA p. 6). Again, given the long-term nature of the problem of climate change (centuries at least, according to climate scientists),<sup>iv</sup> we must ensure that our efforts are appropriately forward-thinking.

With these two concerns in mind – the unpredictability but near certainty of continued sea level rise and the inevitable deterioration of infrastructure over time – it is obvious that the ESCR project must be flexible, adaptable, and amendable in order to be successful in the long term. The City's pledge to "look to the best available science" regarding updated climate projections and to conduct "periodic inspections on a 10-year frequency schedule" to assess the effectiveness of the flood protection system (Action Plan Amendment p. 6) are commitments that must be followed through on.

## ***Development & Social Concerns***

The ESCR's stated goal of "reducing overall social vulnerability and increasing social cohesion in the Lower East Side" through increased connectivity, improved recreation opportunities, and increased ecosystem services (BCA p. 84) is admirable. The community stands to benefit greatly from these social benefits in addition to the protection afforded by the ESCR project. However, we feel that certain concerns regarding neighborhood affordability and equity need to be considered.

The Benefit-Cost Analysis lists as value added the "aesthetic benefit generated from making the study area more desirable for businesses and residents to collocate in the area" and "economic revitalization benefits related to the expected perception of reduced flood risk" (BCA p. 85). Property values are expected to increase due to these perceived benefits, and it is suggested that development could be spurred in the wake of reduced flood risk. Since the project recognizes the importance of social cohesion to increase community resilience, it must also recognize how increased property values add to already existing displacement pressures in the neighborhood, and therefore threaten to disrupt the same social cohesion it aims to build.

It is critically important that safety does not supplant affordability, and that a heightened sense of security does not encourage unwise development in a still otherwise sensitive area. It is not enough that the Lower East Side is simply protected from floodwaters; its cultural and economic diversity must be preserved against the more insidious displacement caused by gentrification.

To that end we encourage the City to adhere to the spirit outlined in *OneNYC*, which places equity at the heart of our long-term planning, and ensure that all climate resiliency projects coordinate with simultaneous efforts to maintain affordability, expand opportunity, and prevent displacement.

### ***Closing Comments***

We commend the work of the ESCR project thus far to center local community members, take into account the latest science on climate change, and factor in the importance of an interconnected community in their plans to increase resiliency in the Lower East Side. We hope the project will consider the latest climate science and take into account the long-term resiliency of the community beyond 2050. Furthermore, we stress the importance of continuing to meaningfully engage community members in the planning and execution of the ESCR project, and working to ensure that community members who supported the design of this project will be able to remain in this community to reap the benefits.

Signed,

LESReady! Executive Committee

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<sup>i</sup> <http://www.pnas.org/content/112/44/13508>

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[https://tidesandcurrents.noaa.gov/publications/techrpt83\\_Global\\_and\\_Regional\\_SLR\\_Scenarios\\_for\\_the\\_US\\_final.pdf](https://tidesandcurrents.noaa.gov/publications/techrpt83_Global_and_Regional_SLR_Scenarios_for_the_US_final.pdf)

<sup>iii</sup> <http://rhg.com/notes/trumps-regulatory-rollback-begins>

<sup>iv</sup> <https://ourworld.unu.edu/en/climate-change-what-happens-after-2100>