

East River Park ACTION

Don't kill our park for a bad flood plan

Report Raises Alarming Questions About the East Side Coastal Resiliency (ESCR) Plan for East River Park in Manhattan

A report commissioned by Manhattan Borough President Gale Brewer and City Council Member Carlina Rivera to make recommendations on the flood control plan for East River Park stresses that the project cannot be properly evaluated because vital underlying documents are missing. The Final Environmental Impact Statement for the razing and rebuilding of East River Park does not include the technical reports. That makes it impossible to judge the viability of the project, says the Deltares report.

Background of East River Park's Flood Control Plan

Following the devastation of Superstorm Sandy in 2012, the Lower East Side community engaged in extensive planning meetings with Rebuild By Design, design teams and NYC agencies to develop a plan to protect more than a mile of coastal parkland and adjacent community from Montgomery to East 25th streets. In 2014, this resulted in a design that won \$335 million in federal funding. Following this funding allocation, there were four more years of planning work which engaged the community to refine the vision. The cost would be about \$770 million.

In October 2018, the Mayor's Office abruptly scrapped the collaborative design for the section of the ESCR. Instead the City plan (called "The Preferred Alternative 4") would destroy the existing park and build an 8-10 foot seawall along the river. After the park is bulldozed and covered in landfill, a new, higher park of similar design to the existing park would be installed. The cost would be \$1.45 billion.

The City's bait and switch was an outrage to the community.

Dutch Consultant Brought in to Evaluate Plan

Throughout 2019, in hearings, comments on the Draft Environmental Impact Statement, and in protests, the vast majority of community members opposed the new plan. Among other demands, community members repeatedly asked that the The "Preferred Alternative 4" be evaluated by an independent panel of environmental and public health experts.

Instead, in September 2019, Manhattan Borough President Gale Brewer and Council Member Carlina Rivera announced the ESCR plan would receive an independent review from a *single* expert, Hans Gehrels, an engineer/hydrologist of the Dutch

engineering firm, Deltares, to be ready by September 23rd in time for the Department of City Planning Commission vote.

Votes and Hearings Despite Lack of Review Documents

Even though the Deltares report was not completed by September 23rd, the DCP Commission voted to approve the project.

On October 2nd, Mayor de Blasio [announced an about-face](#) with regard to a timetable of the city's new ESCR plan: a switch to construction work in phases to avoid full closure of the park, extending the projected completion of the project to late 2025.

The following day, although neither details of the Mayor's revised phasing plan nor the Deltares report were available, the City Council Subcommittee on Landmarks, Sitings and Dispositions held a hearing on the new ESCR plan.

Grave Concerns Brought Out by Deltares Report

Not long after the City Council hearing, we learned that Deltares had previously secured a contract as part of the City's \$10 billion dollar Financial District and Seaport Climate Resilience Master Plan. The prior contract for another City coastal resiliency plan is clearly a conflict of interest. **However, the report, released on Oct. 11, criticized the "Preferred Alternative 4" on several fronts:**

- The Deltares report does not answer prior concerns raised by the City Council members, the borough president, Community Boards, and community members about timelines, air quality, landfill settling, and other environmental and technical issues
- There is a striking absence of compelling advocacy for either plan Deltares was asked to evaluate—the "Preferred Alternative 4" or Alternative 3, which would be somewhat less destructive. Gehrels made clear he was not employed to suggest other alternatives or adaptations.
- Gehrels also made clear that he was **unable to evaluate the Final Environmental Impact Study (FEIS) because of missing documents**. He was not provided technical information needed to make any considered decision.
- The most dramatic takeaway was that "The Preferred Alternative 4" would protect the park and neighborhood from storm surges and sea level rise for **less than 30 years**. The park would have to be raised an additional two feet for protection until 2100. This would add years for additional construction and dumping of landfill.

"A general issue found in this review was the relative lack of available information on several aspects of the ESCR project design. The FEIS [Final Environmental Impact Statement] is based on project development, calculations, impact assessment, and comparison of alternatives. Underlying documents describing these inputs, however, are not publicly available. The FEIS therefore contains important statements that cannot be evaluated."

- Hans Gehrels

There are three major points of additional uncertainty identified within two sections labeled “Constructibility and Scheduling” and “Reliable Coastal Flood Protection.” The city has maintained that the “Preferred Alternative 4” plan can be completed faster with less disruption to the FDR than the earlier “Alternative 3” plan. However, no engineering report has been made available to substantiate those claims, nor has the recently announced staged construction provided a clear date when the entire park will reopen, only when flood protection will be in place.

“The City states that according to their value engineering report, construction of Alternative 3 would be very difficult. The report concludes that Design Alternative 4 can be completed faster and with a greater degree of certainty. However, this value engineering report is not publicly available to demonstrate these conclusions.”

- Hans Gehrels

In the section, “Reliable Coastal Flood Protection,” Gehrels addresses the claim made by the city that “...the two Alternatives will provide the same level of protection to match FEMA requirements” – itself the “primary goal of the ESCR project.” The city’s assertions are based on work undertaken in 2015 (“East Side Coastal Resiliency Project, Coastal Hydraulics Report, Arcadis, 2015”). This analysis was then extrapolated to support the 2018 version of the ESCR plan. However Gehrels states that this report is also not publicly available.

“...and therefore it is not possible to assess the methods used to extrapolate from the 2015 analysis to the 2018 proposed Alternatives... without an understanding of the extrapolation process it is not possible to validate the assertion in the FEIS that all Alternatives provide similar protections.”

- Hans Gehrels

City Council Should Vote NO

East River Park ACTION Demands That:

- The City Council reject this ill-conceived bait-and-switch plan.
- All missing documents mentioned in the Deltares report must be provided and reviewed by a truly independent expert panel, by the community, and by elected officials.
- The city must reevaluate previous plans developed through the Rebuild by Design process.

For further analysis of the Deltares report, see “The Report on the Report on Flood Control for East River Park” by Brian McGrath, Professor of Urban Design, Parsons: <http://eastriverparkaction.org/2019/10/16/report-on-the-report-on-flood-control-for-east-river-park/>

East River Park ACTION is a grassroots organization of a thousand Lower East Side and East Village residents who are fighting for an environmentally and socially sound

plan for flood control for our neighborhood. The vast majority of neighborhood residents oppose the current plan, as you can see from reams of testimony and emails and calls.

Over the year since the Mayor's "Preferred Alternative 4" was announced, we have become subject matter experts on many aspects of resiliency, flood control best practices, underground streams, and biodiversity. (Some of us already had knowledge as ecologists, planners, etc.) Please call on us!

We seek:

- Interim flood control to protect our neighborhood,*
- A flood control plan that preserves as much of our park as possible to minimize the environmental and social destruction of our neighborhood-- and the planet. (The "Preferred Alternative 4" is highly destructive, energy-intensive, and polluting.)*
- A transparent, community-based process for developing flood control. (With interim flood protection, we do not have to rush to kill a beloved park that residents need for our physical and mental health.)*

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#SaveEastRiverPark

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