

Post Office Box 265 The Bronx, New York 10464-0265

April 15, 2013

Hon. John Marano, Chair Bronx Community Board 10 3165 East Tremont Avenue Bronx, New York 10461 By email: bx10@cb.nyc.gov

Dear Chair Marano:

Since 1971, the Bronx Council for Environmental Quality (BCEQ) has been in the forefront to protect The Bronx Ecology. Formed by many socially conscious people, it was founded by Theresa Lato, who believed networking and local community exchanges would accomplish her goal for our borough and create "an aesthetic and unpolluted environment, with a natural and historic heritage."

At the Wednesday, April 10, 2013 Board of Directors meeting of the Bronx Council for Environmental Quality, we reviewed the presentation titled: "*Bronx Community Board 10 Traffic Management Plan: Interim Progress Report*" developed by the Fund for the City of New York<sup>1</sup> by the Columbia University Graduate Planning Fellow Francesca Camillo (<u>francesca.camillo@gmail.com</u>). Borough President Ruben Diaz was instrumental in urging this study to prepare adequate pedestrian safety for future major commercial projects, including the Macy's Mall at Co-op, the Target and other large retail developments along Brush Avenue, and the Golf Course at Ferry Point Park. The BCEQ Board unanimously approved a motion to support the mission and suggestions in the report and we write to urge your support as well.

The mission of the study was to develop an alternative traffic management plan for CB 10 that focuses on non brick-and-mortar means by which to mitigate the traffic, noise, and air pollution that is expected to result from current and proposed commercial developments occurring along the I-95 corridor between the Whitestone Bridge and Co-op City. The Project Queue includes: 1) Construction of Macy's in the Bay Plaza Mall (underway); 2) Re-development of the Whitestone Multiplex on Brush Avenue (potential); 3) Throggs Neck Shopping Center at Brush and Lafayette Avenues (underway); and 4) Renovation of Ferry Point Park, including an 18-hole golf course (underway).

In addition to safety and calming pedestrian traffic patterns, the Green Infrastructure (GI) in the report should be viewed in the context of abating potential flooding problems. The changing weather patterns have brought on stronger hurricanes, water surges and flooding. With the release of the new "Draff" mapping for insurance, many families and community members may be thinking twice about staying. It is time to step up and direct the ongoing development in a corrected direction that would reduce the

<sup>&</sup>lt;sup>1</sup> The Fund for the City of New York is a premier group, established by the Ford Foundation in 1968 with the mandate to improve the quality of life for all New Yorkers. For over three decades, in partnership with government agencies, nonprofit institutions and foundations, the Fund has developed and helped to implement innovations in policy, programs, practices and technology in order to advance the functioning of government and nonprofit organizations in New York City and beyond. (http://www.fcny.org/)

chances of flooding and thereby reduce flood insurance costs. Community Board 10 should research the possibility of these greening projects falling into the Extra Credits category included in the FEMA Flood Insurance Program. Extra Credit Points that are not listed are activities evaluated for increased public safety, ways to reduce property damage, avoid economic disruption and loss, and protect the environment. Even more credits are given if activities are coordinated through a comprehensive floodplain management plan.

The Community Rating System<sup>2</sup> of the National Flood Insurance Program rating system describes some ways to achieve a "Build Back Better" approach to the projected weather conditions. One listed example: Open Space Preservation has a maximum point savings of 900, if current vacant floodplain parcels will be kept free from development.

Storm water management holds up to 640 points to regulate construction to minimize soil erosion and protect or improve water quality. All this water drainage can be absorbed slowly into properly constructed swales into areas under the highway, rather than entering Westchester Creek Directly or our sewer system where it helps to overflow into our waterways or burden the Hunts Point Sewer Filtration Plant. Each of the new projects should be encouraged to plan Green Roofs, areas of green on parking lots, and rainwater capture and reuse to maintain these green spaces.

Thank you for your time.

Sincerely,

Dorothea Poggi

Dorothea Poggi Vice President, BCEQ

Joyce Hogi

Joyce Hogi President, BCEQ

C: Borough President Ruben Diaz

http://www.floodsmart.gov/floodsmart/pages/residential\_coverage/policy\_rates.jsp

http://www.fema.gov/flood-mitigation-assistance-program

<sup>&</sup>lt;sup>2</sup> As of May 2012, 1,497 communities in the State of New York participate in the Federal Emergency Management Agency's National Flood Insurance Program (NFIP). Of these communities, 29 (or 2%) participate in the Community Rating System (CRS). Of the top 50 New York communities, in terms of total Flood Insurance policies held by residents, 10 participate in the CRS. Here are some interesting links:

http://www.fema.gov/library/file;jsessionid=B23C14D3016BB289D0C149D070403FFE.WorkerPublic2?type=publi shedFile&file=99032\_nfip\_small\_brochure.pdf&fileid=57606b20-514a-11de-b71d-001185636a87\_

http://www.fema.gov/national-flood-insurance-program/national-flood-insurance-program-community-ratingsystem#how

http://www.fema.gov/library/file;jsessionid=D9A9B9D4D6DA7755F792C55187EA9460.WorkerPublic2?type=publishedFile&file=nm\_ny\_nc\_nd\_crs\_may\_2012.zip&fileid=1d88f790-ca9c-11e1-8f68-001cc456982e