

On behalf of the Bronx Council for Environmental Quality Board of Directors, I urge you as a member of Bronx Community Board 8 reject and vote "NO" on the proposed ZCFR Citywide Text Amendment and all of its provisions. I have partially read or scanned through the hundreds of pages for this application and its environmental review.

From the sound of it, you may think Zoning for Coastal Flooding Resiliency (ZCFR) will protect us from coastal flooding, or ensure our waterfronts are rebuilt naturally to capture storm surges and sea level rise, but it does not. Instead, this proposal may increase the size and height of the surge and waves causing more erosion, and will do little to solve most of our flooding problems from bigger and bigger rainfall events. They also have a Draft Environmental Impact Statement (DEIS), but it did not include non-coastal stormwater flooding, demographics, and impacts to vulnerable populations living in the floodplains.

The DEIS missed the impact on the most vulnerable of our neighbors: 50% of the population in or adjacent to the floodplain are non-white, and 56% of the floodplain residents make less than \$75,000 per year for a family of 3 (which is considered low income). It missed the impact of the burden of the pandemic, info-demic, high unemployment, social and racial unrest, and drastic cuts in city services. And it did not explain the use of 2007 FEMA insurance rates, instead of waiting for the new maps and rates forthcoming from FEMA in 2021.

This application is unnecessary:

1. Remove 2013 Zoning Flood Text as it expires one year after FEMA's Final Insurance Rate Map is final --projected for 2021. This proposal was approved by CB8, and is based on emergency changes the city proposed in 2013 after Superstorm Sandy hit NYC on October 29, 2012.
2. Refer 2015 Recovery Text to 8 CBs as it expired July 2020. This proposal impacted 8 community boards with areas destroyed by Superstorm Sandy. While it should be made permanent, it is not a citywide proposal, but should be voted on by the 8 CB impacted. There is no reason for you to vote on impacts that involve another community.

3. Remove COVID-19. The proposal asks to extend the emergency powers used for Sandy to apply for COVID-19 and future events. This should be removed from the citywide proposal, as the emergency powers already used are sufficient, and the pandemic is not finished.
4. Remove Mayoral or City Agency Emergency Powers, including the Board of Standards and Appeals (BSA) and the Buildings Department. 1 and 2 above proves there is already a mechanism.
5. Postpone Adaptive Changes. In 2019, the city's research group collaborated with three communities to organize community engagement.

It is just not fair to move forward on shoring up the hardscape instead of naturally protecting the waterfront areas near our rivers and oceans, the floodplains. They are not protecting the flooding along Broadway. Increased construction increases impervious cover flooding; without mitigation, we will be in trouble. Not only that, FEMA's Community Rating System (CRS) provides discounts when communities take action to reduce their vulnerability to flooding -- they can get credit for more restrictive regulations, acquiring flood-prone property, and other measures that reduce flood damages and protect floodplains.

The real question is why are they rushing this through now? Please reject and vote no on the application. Thank you.