



December 7, 2020

Community Board 8 Land Use Committee

Dear Chairperson Charles Moerdler and Committee Members,

Please accept these comments on behalf of the Bronx Council for Environmental Quality. BCEQ was founded in 1971 by community leaders concerned with the Bronx ecology, is an all-volunteer organization.

From the sound of it, you can easily 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. The impacts of non-coastal stormwater flooding, demographics, and impacts to vulnerable populations living in the floodplains were not in the Draft Environmental Impact Statement (DEIS). What is missing in the environmental review?

- NYC DEP Unified Stormwater Rules, which are designed to manage storm water on all new NYC properties 20,000 square feet or more.
- 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 \$76,000 per year for a family of 3 (which is considered low income).
- The impact of the burden of the pandemic, info-demic, high unemployment, and drastic cuts in city services.
- Explanation for using 2007 FEMA pre-Hurricane Sandy insurance rates, instead of waiting for the new maps and rates forthcoming from FEMA in 2021.

We ask that you vote no on this application as unnecessary:

1. Remove 2013 Zoning Flood Text as it is still in effect. This proposal is based on emergency changes the city proposed in 2013 after Superstorm Sandy hit NYC on October 29, 2012. This temporary text change, approved by Bronx CB8, expires one year after FEMA's Final Insurance Rate Map is final --projected for 2021.
2. Refer 2015 Recovery Text to 8 CBs as it expired July 2020. This impacted 8 community boards in large floodplain areas destroyed by Superstorm Sandy, and should be made permanent. It is not a citywide proposal, but one for the 8 CBs indicated. 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 so why make the change now.
4. Remove Mayoral or City Agency Emergency Powers, including the Board of Standards and Appeals (BSA). Clearly not needed as there is already a mechanism that did 1 and 2 above.
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. The real question is why are they rushing this through now?

Sincerely,

Karen Argenti, BCEQ Secretary