



**BCEQ's Basic Principles for Renewable Energy
and/or any other
Development or Redevelopment "Proposal"
and the necessary Environmental Reviews**

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[BCEQ Doctrine of Low Impact Development \(2006\)](#),
- V. OTHER DOCUMENTS OF INTEREST FROM EPA AND LEAF ISLAND/GAIA INSTITUTE (also attached)
[EPA Green Infrastructure Guidelines \(2007\)](#)
[Leaf Island GI and UHI \(2021\) - Scaling Ecology into Urban Regeneration](#)

BCEQ's Basic Principles for Development and Environmental Reviews

For 50 years, BCEQ, an all-volunteer 501 c-3 organization, has advocated for a sustainable environmental policy for the Bronx; for the protection of Bronx communities from harmful environmental impacts; and for citizens' participation in the decisions that shape their neighborhoods. BCEQ endorses and shares these guidelines with developers who believe in our environmental and community goals.

I. ENVIRONMENTAL REVIEW

A. Prior to SEQRA formal notice, BCEQ should be notified by an official notice and identified as an interested party for the EAS and Scoping Documents under SEQRA. This would be a Preliminary Draft Environmental Assessment and Environmental Impact Statement, and should require at least one public meeting before the entity files any formal environmental reviews.

B. Environmental Review should be in plain language both in English and Spanish. If this is not possible, then arrangements should be made to assist the public in reviewing the proposal, including translations. Meetings can be on zoom and in public, as needed.

C. Citizens Advisory Committee (CAC) should be formed at the inception of the SEQR process and consist of BCEQ Board Members or appointees, and members of the impacted neighborhoods. CAC meetings will be chaired by the community representatives, including setting agenda, minutes, digital newsletters and notices, etc.

D. Assessments of Environmental Impacts should incorporate historical experience of environmental racism in the Bronx and impacts of infrastructure and development on communities

E. Health Impacts and Environmental Determinants of Health should be researched, measured, and assessed with the help of current scientific research and other contributions from the CAC. The Bronx has already suffered more than 1000 small cuts of environmental destruction without public notice and/or mitigation of the harmful impact affecting health outcomes of 62 out of 62 in NYS.

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II. COMMUNITY BENEFITS

- A. **Proposed mitigations** should adopt a zero-sum goal and promise the elimination of existing facilities that new installations and projects are designed to replace.
- B. **Green Infrastructure**, an essential tool for reducing greenhouse gases, sequestering CO₂, lowering the Heat Island Effect, and capturing zero runoff, should be incorporated into new installations and the vicinity around them
- C. **Waterfront open space and greenways** should incorporate Green Infrastructure, such as Living Shorelines, and other natural features to capture runoff, protect water quality, and engineering with nature.
- D. **Environmental Greenways** designed with no new impervious surface, upland access, needs of local communities, organizations, and schools, and include educational and recreational facilities
- E. **Employment for local communities**, including Job Training Programs in Water Resources Utility at the project site as well as during construction of the proposal development or redevelopment, including Green Infrastructure (GI) apprentice program with full time pay with benefits.
- F. **Environmental Justice** is an overriding public policy based on equality, respect and justice, free from any form of discrimination or bias. This means speaking in familiar words and different languages as required.

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II. BRONX NEEDS ASSESSMENT -- the death of 1000 cuts. . . .

- **Cross Bronx Expressway divides the Bronx** in half
- **Highest NYCHA buildings per capita**
- **Pelham Bay Park Garbage Station** – many sick from toxic illegal dumping, BCEQ's first fight¹
- **7 Highways leading to and from the metro area** - Major Deegan Expressway (I-87), Cross Bronx Expressway, Bruckner Expressway, New England Thruway, Bronx River Parkway, Hutchinson River Parkway
- **3 Railroads** - Metro North East and West, including the Oak Point Link that blocks shoreline
- **11 Bridges** - Henry Hudson, Broadway, 207th Street/Fordham Road, Hamilton, Highbridge, 161st Street, 145th Street/149th Street, 3rd Avenue, Metro North Train, Triboro RFK, Throggs Neck, Whitestone, City Island
- **17 Major Regional Projects:** DEP Filtration Plant, Jerome Park Reservoir, and Third Water Tunnel; NYPD Shooting Range; MTA Rail Car Wash; Hunts Point Meat and Fish Market, Yankee Stadium, future Soccer Stadium, Harlem River Yards, Renewable Energy Plans, and temporary Peak Power Plants.
- **Lack of public Open Space**, particularly in the denser south Bronx, while large swaths of land are for fee-based open space (i.e. NYBG, WCS)
- **Under managed, not maintained, or enforced** city services and violations
- **Overcrowded public schools**
- **Inaccessible Waterfront** fronted by Highways Railroad & Bridges

cause major injuries . . .

- Highest Unemployment
- 62 out of 62 counties in health outcomes in the State
- Life expectancy is the lowest of the City's boroughs (80.6 years)
- Highest number of people with no health insurance in the city.
- Outsized burden of NYC's COVID related death toll
- Highest patient numbers for Asthma and Diabetes
- Highest number of low-income communities
- Highest percentage of population with income below the poverty level
- High dropout rate connected to polluted and noisy highways
- Siting industry and commercial uses on waterfront instead of public docs and parks
- No neighborhood planning, therefore not enough competition for Supermarkets, Fresh Fruit, etc.
- Interrupted greenway with many off roads onto highly trafficked
- Extraordinary disinvestments relative to the rest of the city, that equal decades of bank closings, redlining, neglect, and destruction.

¹ <http://historicpelham.blogspot.com/2018/01/remnants-of-ten-story-mountain-of.html>

BCEQ Doctrine of Low Impact Development

June 10th, 2006 Posted in [Low Impact Development](#)

Whereas, BCEQ is being asked to review many new development and re-development projects, we hereby adopt the following as our guideline:

BCEQ Doctrine of Low Impact Development

Every development project should make at least one environmental condition in its vicinity better and make none worse. In addition, new or re-development in the Bronx should prove:

1. Required and/or allowable **parking** incorporates the least number of off-street spaces.
2. **No parking should be free**, except for deliveries.
3. For **redevelopment projects**, no new parking spaces allowed, unless developer meets the “BCEQ Mitigation Trading Criteria.”
4. **Parking should be in a structure that is multi-level**, enclosed with a natural green growth cover to capture rainfall, with scrubbers inside that will clean the air from the car exhaust.
5. **Parking should not be sprawled over blacktop**, or in an area that allows fumes to concentrate and impact the public.
6. **Mass transit should be encouraged** and, as an incentive, should be provided FREE to any and all who purchase tickets and/or use the facility.
7. The city should provide tax incentives to those who provide FREE mass transit as part of the ticket cost (including express buses).
8. **Brownfields should not be capped**, but cleaned to the highest, not just best use. Exception to this includes proposals with natural attenuation and scientifically documented biogeochemical processes with a proven record for cleaning and/or neutralizing the pollutant of concern.
9. Projects promoted by the City should adopt the model professed by the City of New York to the world in its Olympic 2012 proposals, proving the City’s ability to deliver, and thereby promote its ability to attain future Olympic Games. That Model included:
 - a. Sports activities should encourage mass transit use within the city and the metropolitan area by arranging for EXPRESS service on rail, ferry, subway and bus to the stadium (Yankee, Shea or Giant).
 - b. Choose Stormwater Management practices at the highest level, not just determining adequate capacity in the sewers. The city’s policy must be to capture and treat all rainfall prior to discharge into a waterbody, and meet all Phase II Stormwater Regulations. Anything less will never diminish the CSO problem and all of its health implications.

10. Stormwater Criteria should include methods to attenuate, convey, pre-treat, treat & polish stormwater runoff, paid for by the developer, (as adopted from the NYS DOT Route 120 project):

- a. No untreated discharges to the waterbody within the limits of the project.
- b. Multi-barrier watershed approach reduces pollutant loads from existing conditions.
- c. Practices are arranged in “series” providing a “treatment train” prior to discharge from the project site.
- d. Design provides oil spill/containment treatment.
- e. Design includes both structural and nonstructural components compatible with the natural and constructed features of project site.
- f. No net increase of impervious surfaces from project within the watershed basin.
- g. Natural water capture vegetated landscape and street cleaning are on the treatment train.
- h. The Soil Erosion & Sediment Control Plan (SESCP) is limiting and confining the extent of disturbance to protect natural vegetation.
- i. Annual stormwater facilities maintenance contract will be used to maintain the stormwater facilities.
- j. Mitigated wetlands must be in the same watershed basin. Mitigated wetland impacts will be monitored for 10 years.

11. BCEQ Mitigation Trading Criteria includes:

- a. Replacement should be by Tree Diameter – inch for inch. It does not matter if the tree is currently not alive, as long as the diameter is measured and included in the analysis.
- b. It is not equivalent to replace older and larger trees with multiples of smaller one’s. So if the exact size is not available then the exchange should be “wood for wood” – that is the area of the new tree would be equal to the area of the old tree, or πR^2 times the height.
- c. Exception to the inch for inch tree replacement scenario would be an upgrade to a higher level of tree, that is, one that cleans the air, is drought and pollutant resistant, is long living, or a multiple of five to one, using trees $\frac{3}{4}$ of the replacement diameter.
- d. New housing development projects are required to include street tree plantings as part of the builder’s paving plan. This should be strictly enforced and notice should be provided to the local community board.
- e. If turf must be used on green areas (and particularly in sports areas), it should be replaced by credits toward green open space or roof top gardens within a 500 foot radius.

This shall be posted on our web site. Approved, Board of Directors on May 10, 2006.

Revised parts were added on June 10, 2006 after comments from members.

[EPA Memo on Green Infrastructure March 2007](#) (PDF) – This is a great memo that explains the benefits of Green Infrastructure. A must read.