



*Making Great Communities Happen*

November 12, 2010

Mr. Michael L. Marrella, AICP  
Project Director, Comprehensive Waterfront Plan  
New York City Department of City Planning  
22 Reade Street, Suite 2W  
New York, NY 10007-1216

Re: APA NY Metro Chapter Task Force - Comments on Draft Recommendations (9/7/10) for  
“*Vision 2020: New York City Comprehensive Waterfront Plan*”

Dear Mr. Marrella:

The New York Metro Chapter of the American Planning Association recognizes the Department of City Planning of the City of New York for its extensive work on updating the City’s first Comprehensive Waterfront Plan of 1992 and for drafting a vision for the next ten years that acknowledges the waterfront’s value as a public resource and continues to support its productive use and increased enjoyment.

We are a local chapter of the 41,000-member American Planning Association, a national organization dedicated to creating livable communities of lasting value. On behalf of our 1400 members involved in the planning and design of the region’s communities located throughout the City, Long Island, and Hudson Valley, we thank you for the opportunity to participate in the Waterfront Planning Working Group. We especially appreciate your open planning process and encouragement of broad public participation, which included public hearings in all the boroughs. Many members of our Chapter work with the New York City waterfront issues on a daily basis. We offer these comments on the proposed goals to provide input and contribute to the public discussion of the Draft Recommendations.

APA’s NY Metro Chapter sees *Vision 2020: New York City Comprehensive Waterfront Plan* as an extraordinary planning tool to continue providing a framework to guide land and water uses in a way that balances the needs of our natural habitats and working port with opportunities for public access, parks, housing, and commerce at appropriate locations along New York City’s diverse waterfront. Our detailed comments are provided in Attachment A of this letter and framed to help optimize the possibilities. Highlights include:

- Provide housing and jobs for people of diverse incomes (a goal of the 1992 Plan)
- Reprioritize perimeter vehicular uses to increase public access and safety
- Extend economic development to include the public and redeveloping waterfronts
- Protect and restore the natural waterfront as part of an interconnected watershed
- Integrate the Blue Network within the larger public transportation system
- Address the causes as well as consequences of climate change
- Ensure financial resources to the waterfront commensurate with its larger public benefits.

Our comments are primarily directed towards the citywide Programmatic Recommendations, rather than the site-specific Reach Recommendations, and are organized into a page of general remarks

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followed by one page on each of the Programmatic Recommendations with a suggested rewording of the goal at the top of the page.

We hope these recommendations are helpful and thank you again for the opportunity to provide you and the Department of City Planning with our collective professional expertise and input into *Vision 2020: NYC Comprehensive Waterfront Plan*. The Plan and upcoming *NYC Waterfront Action Agenda* will be used by many of the members of the APA's NY Metro Chapter, and we look forward to a continued collaboration with you and your department in this process.

Sincerely,



Donald C. Burns, AICP  
President, New York Metro Chapter  
American Planning Association

cc: APA Metro Chapter Executive Committee  
APA Waterfront Committee



## ATTACHMENT A

APA NY Metro Chapter Task Force - Comments on Draft Recommendations (9/7/10) for  
“Vision 2020: New York City Comprehensive Waterfront Plan”

### General Comments

**1992 Plan / 2010 Update** - We recommend that *Vision 2020: NYC Comprehensive Waterfront Plan* be revised and restructured along the lines of the excellent 1992 *NYC Comprehensive Waterfront Plan: Reclaiming the City’s Edge* so that waterfront development may continue to be considered in the context of City policy and serve as a tool to guide planners, community residents, businesses, and other stakeholders.

The 1992 Plan was comprehensive in scope and included chapters on the overall planning framework, different types of waterfronts (natural, public, working, and redeveloping), waterfront zoning, and implementation strategies. Appendices were also included summarizing the reach recommendations and Waterfront Revitalization Program. At a minimum, *Vision 2020* should address what has worked since 1992, what is still relevant, and what needs to be revisited.

**Action Agenda & Priorities** –We understand that a second component of The Waterfront Vision and Enhancement Strategy (WAVES), the *New York City Waterfront Action Agenda*, is in progress and will prioritize initiatives to be implemented by 2013. APA’s Metro Chapter recommends an open process to discuss those priorities and supports the Department of City Planning’s role in proactive planning for these initiatives. High on the criteria for prioritization should be public safety, environmental and economic sustainability, and other public benefits.

**Related Actions** – Related future actions that should be informed by the *Vision 2020* include:

- Zoning,
- Waterfront Access Plans,
- Land use (in particular to optimize use of the waterfront, address potential conflicts, and mitigate environmental impacts), and
- Public parks.

**Programmatic & Reach Recommendations** - Linking the programmatic goals (which are very broad and general) with examples from the reaches (which are very specific) would be helpful in showing exactly how a policy goal would be implemented.

**Citywide Map** - A final product with a comprehensive citywide map as part of *Vision 2020* would be helpful for understanding the range and distribution of projects that are proposed in each reach.

**Goal #1** – APA’s NY Metro Chapter recommends restructuring Goal #1 into two goals: Public Access and Waterfront Uses. Both are important and complex issues that, while interrelated, deserve to be considered individually.

**Glossary** - A glossary defining the maritime and waterfront-specific terms would be useful, especially to non-professional readers.

## **Goal #1a: Public Access**

*“Expand public access to the waterfront and waterways for all New Yorkers and visitors alike,”*

**APA’s NY Metro Chapter recommends providing and increasing public access because it is a key to helping people enjoy and protect their waterfront resources. It should be a guiding objective and separate goal.**

**Public Access & Priorities** - As part of the historic legacy of a shoreline taken over by private shipping and associated maritime infrastructure, New York City continues to live with a perimeter ringed by arterial highways and outdated “Marginal Streets,” now often utilized for other vehicular functions such as parking. These pose serious barriers to both physical and visual access to and along the waterfront. APA’s Metro Chapter recommends *Vision 2020* address more directly reprioritizations of the role of vehicular uses near the waterfront in recognition of the need to increase public waterfront access and use while also reconciling safety. In particular, we support increasing access by public transit, water-borne transportation, bicyclists, and pedestrians.

**Proactive Planning** – We support continuing to anticipate future development with *Waterfront Access Plans* prepared by the City, rather than individual developers or property owners, so that public access is oriented and sized for each reach or subarea.

**Views** – APA’s NY Metro Chapter recommends reinstating the 1992 goal, which has been omitted, of a 21<sup>st</sup> century waterfront where “panoramic water views of great beauty are preserved or created.”

**Wayfinding** – We support a waterfront signage program to make wayfinding easier and more consistent throughout the city that may allow Borough-, reach-, or site-specific design identities, and also establish inter-agency consistency in signage, providing a shared signage vocabulary. We also suggest educational/interpretive signage or materials not just at the waterfront but at storm drains and other watershed locations to help people become more aware of the hydrology of their home.

**Working Waterfront** – Where public access might interfere with navigation or public safety, leverage the working waterfront visual impacts as an amenity and educational tool, using methods sometimes seen at construction sites (observation windows, decks, how-to signage, etc.).

**Historic Resources** – Historic resources on the waterfront should be specifically identified in the Plan. The Chapter supports working with property owners and coordinating with public agencies to prevent shoreline erosion in locations where it would jeopardize historic properties. Where shoreline erosion is irreversible, consider moving structures inland.

**Public Education & Stewardship** - We believe waterfront access is an opportunity to educate people about water quality and watershed issues - that is, to build the constituency that will be brought to the waterfront to grow stewardship of our water resources. Instead of “encouraging” best practices in environmental stewardship, for example, we would suggest mandating them or providing strong incentives.

**Adopt-a-Waterfront** - The city should create an adopt-a-waterfront program (similar to existing adopt-a-highway programs) that allows neighborhood groups to, for example, pick up trash in sections of the waterfront including along nearby streets that drain directly to the water. This will save money for the City by leveraging the enthusiasm of citizens and foster a closer connection to the waterfront among residents.

## **Goal #1b: Waterfront Uses**

*“Create a waterfront where the city’s needs for new housing and jobs for people of diverse income levels are satisfied in attractive and safe surroundings. Respect natural habitats while enlivening the waterfront with attractive uses, high-quality public spaces, and publicly oriented water-dependent uses, integrated with and connected to adjacent upland communities.”*

**In 1992 New Yorkers came together to reclaim a waterfront where large sections had been left dormant after decades of shifting patterns of maritime commerce. To support the continuing transformation of uses along the waterfront, we recommend keeping a primary goal of the 1992 plan: A 21st century waterfront where “the city’s needs for new housing and jobs for people of diverse income levels are satisfied in attractive and safe surroundings.” This goal has been omitted from the 2010 Draft Recommendations and we recommend it be restored.**

**Residential and Mixed-Uses** - The Programmatic Recommendations include little discussion of residential or mixed use development; however the individual waterfront neighborhood subsections of the Reach Recommendations include three sites designated for residential/mixed use development and ten other sites for general redevelopment. The APA Metro Chapter suggests inclusion of the following principles to the Programmatic Recommendations to guide site redevelopment.

**Inclusiveness** - Future development of significant magnitude should promote social and economic diversity providing affordable housing for varied income levels and jobs for local residents. Commercial development, community facilities, and waterfront attractions should serve local residents, attract visitors from the broader metropolitan area, and welcome tourists. Redevelopment strategies should assess existing community infrastructures and services, and seek to address needs in the adjacent neighborhood.

**Funding Strategies** - The APA Metro Chapter strongly supports exploring sources and mechanisms to provide financial resources to the waterfront in view of the larger public benefits generated far upland. Development negotiations that consider upland tradeoffs between housing affordability, development density and community amenities is one mechanism to be evaluated.

**Character** - In terms of scale and mass of any proposed development, zoning should preserve waterfront views from existing public spaces and streets that are located further upland. In doing so, any proposed new development's scale and bulk should respect neighborhood density and character as determined through local community planning processes. The intent should be to facilitate full public accessibility and use.

**Public Participation** - Given the unique housing and socioeconomic characteristics of individual waterfront neighborhoods, the APA Metro Chapter recommends that the *Comprehensive Waterfront Plan* facilitate meaningful input from all segments of the local communities into local waterfront planning and throughout the development process.

## **Goal #2: Economic Development**

*“Support economic development activity on the working, public and redeveloping waterfronts.”*

**APA NY Metro Chapter supports the recommendations for economic development on the working waterfront and its encouragement of “green port” practices. In addition, in areas where maritime and industrial uses are not feasible or desirable, we support sustainable economic development in the form of new housing, businesses, waterfront parks and esplanades where they are environmentally appropriate. These non-maritime developments can have positive economic impacts and significantly expand public access to the waterfront.**

**Maritime & Industrial Uses** - The NY Metro Chapter generally supports the recommendations regarding economic development on the working waterfront. The Port Authority of New York and New Jersey (PANYNJ) is a vital element of the regional economy and maritime facilities in the five boroughs, particularly Brooklyn, Staten Island and the Passenger Ship Terminal on the West Side of Manhattan, are important components of the regional port. Since the 1992 plan, the city has seen growth and expansion of its maritime facilities – including the expansion of the New York Container Terminal at Howland Hook and implementation of the intermodal ExpressRail Staten Island, the PANYNJ’s acquisition of the Cross-Harbor Railroad, the opening of the Brooklyn Cruise Terminal at Red Hook, and last year’s expansion of the South Brooklyn Marine Terminal.

**Other Uses** – The APA NY Metro Chapter questions the Draft Recommendations’ singular focus on maritime and industrial businesses as catalysts for economic development on the NYC waterfront. This narrow focus would seem to ignore the significant transformation that has taken place on the waterfront during the last 20 years, with the development of waterfront parks and esplanades in all five boroughs - many in areas where maritime uses are not economically feasible or desirable – and the positive economic development impacts these non-maritime developments have had both on the waterfront and in upland areas. In addition to increasing tax revenues and property values, these developments have significantly expanded public access to the waterfront.

**Mixed Maritime & Other Uses** – In other cities, maritime and industrial uses have been developed in concert with other waterfront uses as a more mixed-use approach to waterfront development. A singular focus on maritime and industrial use ignores current economic realities and would seem to stymie more innovative approaches to waterfront development.

**SMIA Legal Notice** - Legal notice requirements for new residential developments near SMIA’s may protect maritime and industrial uses but have the unintended consequence of deterring residential developers. We recommend the City develop guidelines to assist would-be waterfront developers and adjacent maritime uses in devising strategies that allow the uses to co-exist.

**Green Ports** - We also support the encouragement of green technologies and practices at waterfront industrial areas and ports. We have seen this recommendation put into practice by the PANYNJ with the use of green technologies at ExpressRail Staten Island and the Cross-Harbor Freight Plan.

**Security Buffers** - Not all businesses and industries truly require a buffer between their premises and waterfront infrastructure. The Plan should specify which industries are permitted such treatment and be careful when implementing its goal of mixing uses and providing physical or visual access through properties. Otherwise, the City risks creating a situation in which all businesses will ask for a security buffer.

### **Goal #3: Natural Waterfront**

*“Protect and restore degraded ecosystems, protect wetlands and shoreline habitats, improve the environmental quality of our water bodies, and maintain the natural waterfronts.”*

**APA’s NY Metro Chapter believes that New York City is an integral part of an interconnected watershed increasingly stressed by inappropriate development and climate change.**

**Wetland Policy and Coordination** - Wetland coordination is poised for implementation and the selection of an agency as part of a near-term implementation objective for the plan would move this initiative forward. This not only advances the preservation and restoration of wetlands, but also opens opportunities for important waterfront redevelopment projects by supporting a comprehensive wetland mitigation strategy.

**City-Owned Wetlands** – While a hierarchy of wetland projects based primarily on the current level of degradation would be useful, other factors such as potential ecological benefits, public access, size, and costs are also important values. Estimating potential costs would assist in identifying possible funding resources. Provide a preliminary list of projects as part of *Vision 2020*.

**Water Pollution Control Plants** - Include (perhaps as an Appendix) a summary of proposed NYCDEP projects and plant modifications. This would be helpful in understanding the costs and funding sources, associated water quality benefits, and needs for agency coordination, and would assist in monitoring progress of major capital projects in the coastal zone for future Plan updates.

**Stormwater Management** - Runoff source reduction is highly encouraged. There may be areas of the City where the coastal zone boundary could be expanded to incorporate additional land into the requirements of this policy (for example, all of Manhattan drains to the harbor via CSOs, but only portions are part of the coastal zone in which the policy would apply). Also, a listing of NYCDEP capital projects and programs related to stormwater management and CSO abatement as well as the Bluebelt program would be helpful.

**Biodiversity and Native Species** - Referencing specific projects or planting details would be helpful to guide future projects or modify planting programs that could be implemented under the City’s waterfront zoning text.

**Draft Comprehensive Restoration Plan** - Explore regional permitting opportunities that would allow for expedited review or provide “nationwide permit” status to minor wetlands restoration projects in order to reduce permit approval time frames.

**Waterfront Revitalization Program** - Identify and organize the sites listed under this goal by their ecological importance/principal habitat type. This would provide the opportunity to understand the potential diversity of protected habitats that may be achieved (e.g., river corridor, ponds, upland forest, estuarine, coastal beach/bluff, etc.).

**Green & Multi-Purpose Infrastructure:** The APA NY Metro Chapter supports DEP’s green infrastructure initiatives and the creation of a foundation to facilitate implementation of its recommendations, including the allocation of land, canals and other waterways. Properties appropriate for abandonment should be identified to allow coastal wetlands to migrate. We suggest a comprehensive look at green – and multi-purpose - infrastructure of all types to reduce greenhouse gas emissions and bring down the costs of overlapping public investments at the waterfront.

#### **Goal #4: “Blue/Green Network” – Water and Land Transportation**

*“Enhance the public experience of the “Blue Network” by expanding waterborne transportation, on-water recreation, as well as water-oriented educational and cultural activities. Integrate the Blue Network with existing and projected land uses and transportation systems, including greenways.”*

**Another remnant of the history of private shipping along our waterfront is the location of public transportation systems inland away from the waterways. Today this results in a mismatch between changing waterfront uses and the transportation systems needed to connect them by both land and water. APA NY Metro Chapter recommends that the Blue Network not be developed as a free-standing system, but rather integrated with existing and projected land uses and transportation systems, including new greenways.**

**Balanced User Needs** - While industrial/shipping use of the Blue Network is vital, we recommend this goal more clearly balance the needs of all users.

**Integrated Systems** - Integration of the Blue Network within the larger transportation system should be emphasized. Cooperation with existing transportation agencies and policy makers will be key to coordination. It is our understanding that the Plan has deferred discussion of a ferry network in light of the NYC Waterborne Transportation Plan that will be released soon. If this is the case, the Plan should mention this and refer to the document. Because subways in some of the high-growth, waterfront areas are overburdened and farther than a comfortable walking distance, the City should develop a ferry system that is truly integrated with the rest of the city’s public transit system. For example, the ferries could connect to crosstown light rail or BRT (bus rapid transit) originating from terminals in Manhattan.

**Safety** - To make the goals more recreation-friendly, we would like to see an emphasis on safety, education, and enforcement of standards and rules, especially to the extent that increased use of the Blue Network will bring new users to the water. We would put a greater emphasis on wayfinding while on the Blue Network and at transition points from the water to the land.

**Transit-Oriented Development (TOD)** - If the City truly proposes to encourage waterfront TOD, it should ensure that providing adequate ferry service is environmentally sustainable and economically feasible in order to discourage vehicle use by residents and visitors of these developments. Also, the City should restrict the amount of parking in new waterfront buildings to further emphasize reliance on land and water public transit, biking, and walking to and along waterfront.

**Industrial Uses** – The APA NY Metro Chapter would like to ensure that access to industrial areas be considered, provided it can be maintained safely and securely for all users (i.e., visitors and industries). Consider education and interpretation opportunities provided by access to industrial waterfront areas (“industrial sightseeing”). We propose transparent fencing or viewshed opportunities when access to the waterfront itself cannot be provided.

**Parking Lots** - Where new parking lots must be developed, we support the City’s zoning provisions limiting intensity, hardscaping and heat island effects and using stormwater-friendly materials in order to reduce runoff. It is our hope that these lots may be transitioned to new uses over time.

**Forgotten Waterways** - As the Blue Network grows, we suggest identifying “forgotten waterways of NYC” and the opportunity for documenting former waterfront areas or even daylighting previously buried waterways to provide additional waterfront access.

## **Goal #5: Climate Change**

*“Increase the City’s resilience to sea level rise and other climate change impacts. Help address the causes of climate change when opportunities arise on the waterfront.”*

**Given the risks to life and public safety and possibility of property losses, for example from severe storms and flooding, APA’s NY Metro Chapter recommends that the Comprehensive Waterfront Plan designate climate-sensitive waterfront zones, provide prioritization of areas at risk, and recommend building and zoning codes specific to those risks.**

**Address Causes of Climate Change** – APA’s NY Metro Chapter sees opportunities on the waterfront to help address the causes, not just the consequences, of climate change with proactive planning such as transit-oriented development, energy-efficient infrastructure, smart growth, and protection of shoreline habitats.

**Accurate Data** - For the Plan to provide a framework for long-term value, future waterfront use planning must also be based on accurate, current data sets, topographic information and bathymetric calculations, as well as an in-depth, evolving understanding of possible threats. We recommend the best available, state-of-the-art data be tied in with existing City GIS mapping systems.

**Temperature Rise** – We note that the Draft Recommendations do not take into account the impacts of temperature rise (both air and water) on coastal habitats, and recommend that those be added.

**Urban Green Council** – The APA NY Metro Chapter supports the “green codes” proposals published by the Urban Green Council in February 2010 and recommends that the Comprehensive Waterfront Plan incorporate the following proposals from that report with respect to Building Resilience and Stormwater Management as they relate to the New York City waterfront:

BR 1: Create and Use 2090 Flood Map Based on Climate Change Predictions

BR 2: Safeguard Toxic Materials Stored in Flood Zones

BR 3: Study Adaptive Strategies to Flooding

SW 1: Reduce Excessive Paving of Sites

SW 2: Reduce Stormwater Runoff From New Developments

SW 3: Reduce Stormwater Runoff from Construction Sites

SW 4: Send Rainwater To Waterways

SW 5: Encourage Innovative Stormwater Practices

SW 6: Maintain Site-Based Stormwater Detention System

SW 7: Analyze Strategies to Reduce Stormwater Runoff From Existing Developments

## **Goal #6: Regulation, Oversight & Financial Resources**

*“Increase the efficiency of waterfront regulation, oversight, construction and operations. Ensure financial resources be provided to the waterfront zone in recognition of its larger public benefits.”*

**APA’s NY Metro Chapter supports a clarification of roles and responsibilities on the waterfront in light of experiences since the revisions to the City Charter.**

**Regulation** - The APA NY Metro Chapter agrees that greater efficiency in permitting is a desirable goal. However, because permitting procedures involve multiple layers of government, each with specific purviews and jurisdictions, a new City office might not streamline the process. It would be helpful to modify the Plan’s generalized recommendations by providing a clear sequence of approvals for work on the waterfront so as to create a more predictable timeframe.

**City Oversight of Waterfront** – For general oversight and specific waterfront issues, the APA NY Metro Chapter would support an inter-agency task force led by the Department of City Planning with representatives from the region. Rather than a new agency, we recommend that waterfront expertise be embedded in all relevant City agencies with appropriate standing to guide the process, similar to the way specific environmental impact expertise is currently distributed.

**Harbor Management Plans** - It may be appropriate to develop harbor management plans for Jamaica Bay and Flushing Bay/River (and perhaps other City bays) that would examine their great range of uses and identify potential land and water planning opportunities including redevelopment, wetland preservation and enhancement, boating and navigation, and public access.

**Federal and New York State Funding** - The APA NY Metro Chapter supports efforts to ensure that New York Harbor receives its fair share of federal and state funding. We note that this is a matter for the City to address directly with our Senators, Congresspeople, and Governor, as well as on a bi-state basis.

**Financial Resources** – Finally, APA NY Metro Chapter strongly supports exploring mechanisms to provide financial resources to the waterfront zone in view of the larger public benefits generated far upland by its open views, significant habitats, crucial infrastructure, thriving businesses, vibrant residential communities, and beloved public parks.