



# Sandy Regional Assembly

# **SIRR ANALYSIS**

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An assessment of the  
Mayors' Special Initiative for Rebuilding and Resiliency (SIRR) Plan, and  
recommendations for the federal Hurricane Sandy Rebuilding Task Force

**July 2013**

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# Sandy Regional Assembly

The Sandy Regional Assembly Recovery Agenda has been endorsed by the following participants:

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- ALIGN
- Coalition to Preserve Community
- Concerned Citizens Coalition of Long Branch
- El Puente
- Environmental Task Force of the Congregation of Saint Saviour
- Friends of Brook Park
- GOLES
- Good Jobs New York
- Ironbound Community Corporation
- LiUNA! Local 78 Asbestos, Lead & Hazardous Waste Workers
- Morningside Heights West Harlem Sanitation Coalition
- NJ Environmental Federation
- NJ Environmental Justice Alliance
- NJ Work Environment Council
- North Shore Community Coalition for Environmental Justice
- Natural Resources Defense Council
- North Shore Waterfront Conservancy of Staten Island
- NYC Environmental Justice Alliance
- NY Lawyers for the Public Interest
- Ocean Bay Community Development Corporation
- Pratt Center for Community Development
- South Bronx Unite
- Sustainable Long Island
- Sustainable South Bronx
- The Point CDC
- Transportation Workers Union Local 100
- UPROSE
- VOCAL-NY
- WE ACT for Environmental Justice
- Weequahic Park Association
- We Stay/Nos Quedamos, Inc
- Workers Justice Project
- Youth Ministries for Peace and Justice

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# Executive Summary



Sandy Regional Assembly Recovery Agenda briefing with Secretary Donovan, Spring 2013

On January 26, 2013, nearly 200 participants representing over 40 community, environmental justice, labor and civic groups from New York, New Jersey and Long Island neighborhoods most impacted by Superstorm Sandy (and most vulnerable to future storm surges) convened the Sandy Regional Assembly. This group coalesced to strategize how government officials should implement a Sandy recovery and rebuilding program that responds to the needs and priorities of vulnerable groups, particularly in low-income neighborhoods and communities of color.

Representing community-defined priorities from across the NY-NJ region, the Sandy Regional Assembly Recovery Agenda was released on April 1, 2013. The Agenda has 2 parts: First, a compendium of suggested capital projects, plans and other initiatives that identify priority capital projects that are: a) located in storm-surge vulnerable areas; b) have some climate adaptation and/or resiliency benefits; and c) are already planned, designed or budgeted, and supported by both government and community. Second, the Agenda includes a set of policy recommendations to advance 3 basic goals: 1) Integrate regional rebuilding efforts with local resiliency priorities; 2) Strengthen vulnerable communities & reduce public health threats; and 3) Expand community-based climate change planning, disaster preparedness and response.

The Sandy Regional Assembly Recovery Agenda focuses on practical recommendations to increase community resiliency that should be incorporated into federal, State, and City post-Sandy planning. In order to advance this goal, community representatives from the Assembly presented the Agenda to the U.S. Department of Housing and Urban Development Secretary Shaun Donovan, and staff in the federal Hurricane Sandy Rebuilding Task Force; Governor Cuomo's Office; the federal Joint Field Office (led by FEMA under the National Disaster Recovery Framework); and the NYC Mayor's Special Initiative for Rebuilding and Resiliency (or SIRR).

The NYC Mayor's Special Initiative for Rebuilding and Resiliency (SIRR) is a comprehensive effort to formulate recommendations guiding the rebuilding of neighborhoods impacted by Superstorm Sandy, and increase the resiliency of New York City as a whole. The plan combines citywide proposals with neighborhood-specific interventions in various neighborhoods. The federal Hurricane Sandy Rebuilding Task Force administered by HUD is responsible for overseeing the rebuilding and allocation of funds for all post-Sandy projects funded by the federal government; the Task Force is also charged with preparing a Hurricane Sandy Rebuilding Strategy to present to President Obama by August 2<sup>nd</sup>. Recommendations in the SIRR Report include plans to allocate the \$294 million in HUD funding already provided to New York City and must comply with the Hurricane Sandy Rebuilding Task Force guidelines.

After the Mayor's SIRR Report was released in June 2013, the Sandy Regional Assembly met to assess whether community-defined priorities and recommendations had made it into the Mayor's recovery plans. The following assessment reviews the SIRR Report from the context of the Sandy Regional Assembly Recovery Agenda, including both areas where there is synergy with the goals and recommendations of the Agenda and areas where the SIRR failed to address critical community priorities.

The SIRR provides some comprehensive tools to address New York City vulnerabilities and prepare for stronger and more frequent climate change impacts. For example, the SIRR envisions building on PlaNYC 2030 to secure the "cross-silo" institutional capacity of municipal government to facilitate implementation. In addition, the SIRR proposes a combination of hard engineering projects with green infrastructure interventions that do not rely on a single type of solution. Moreover, the SIRR commits to finishing existing initiatives, such as efforts to assess the

## Executive Summary

vulnerability of open industrial uses and brownfields to climate change impacts, and partially responds to the Sandy Regional Assembly recommendation to explore mitigation opportunities in enclosed industrial facilities. The SIRR also recognizes the role of community-based organizations in conducting outreach to vulnerable communities, announcing resources to identify community needs and increasing local capacity.

However, the challenges posed by climate change are diverse and complex, affecting New Yorkers in different ways. Planning for a more resilient future needs to be an ongoing inclusive conversation where all voices are represented at the table when decisions are made and proposals implemented. This will help ensure that no neighborhood is left behind; that significant attention is given to climate change cumulative impacts in historically over-burdened environmental justice communities; and that community-based organizations' capacity to conduct research, plan and respond during emergencies is fully supported and integrated into the process.



Sandy Regional Assembly follow-up discussions, Summer 2013

Unfortunately, there are no significant provisions for public comment on the recommendations or neighborhood-based projects and proposals articulated by the SIRR. There is no detailed assessment of post-Sandy impacts on public health in the SIRR report, with very limited information on reported hazardous spills that might have affected workers and residents. These are troubling and unnecessary oversights, especially given the active presence of locally-based policy and planning networks and community-based organizations that have advocated to mitigate these climate change risks – for years, in some cases – among other environmental justice, resiliency and sustainability issues in these communities.

The Sandy Regional Assembly welcomes the opportunity to work with government agencies to address these concerns as the recovery process moves forward. As the next step in this dialogue, this assessment presents a series of Sandy Regional Assembly Recovery Agenda recommendations – overlooked by the SIRR – for the federal Hurricane Sandy Rebuilding Task Force to include in its upcoming Sandy Rebuilding Strategy report to the President.

In further NYC requests for federal funding, the Task Force should require that, among other important priorities highlighted by the Sandy Regional Assembly, New York City: 1) expand existing community engagement policies, and guarantee an inclusive decision-making process (with multiple opportunities for community oversight and participation) to hold recovery projects accountable for promises made; 2) incorporate existing and future community-based planning initiatives that expand adaptation and resiliency strategies to the coastal protection measurements proposed by the SIRR to ensure no vulnerable community is left behind; and 3) ensure that recovery and resiliency planning efforts address the needs of the most vulnerable communities. As part of this process, the City should develop a Community Health Investigation to determine health impacts of post-Sandy contamination and health hazards on community first responders and recovery workers; including post-traumatic stress disorder, and a detailed documentation of the public health risks and potential impacts associated with exposures to clusters of hazardous substances and toxic chemicals handled, manufactured and transferred in industrial facilities and sites vulnerable to climate change.

# Special Initiative for Rebuilding and Resiliency (SIRR): Positive accomplishments

The following section identifies recommendations by the SIRR report “A Stronger, More Resilient New York” that address some Sandy Regional Assembly Recovery Agenda priorities.

## a. General observations

- . The SIRR report builds on the framework created by PlaNYC2030, securing an important level of inter-agency coordination. These efforts will be spearheaded by the Mayor’s Office of Long-Term Planning and Sustainability, a Director of Resilience, and three inter-agency work groups to focus on coastal protection, the built environment, and other cross-cutting resiliency issues that will require additional coordination.
- . The SIRR identifies indicators that will measure the progress of the plan in many areas, including wastewater infrastructure resiliency, Combined Sewage Overflows (CSOs) runoff mitigation, and implementation of Staten Island’s blue-belt projects – which are directly related with low-income neighborhoods and communities that live in industrial waterfront areas.

## b. Coastal protection

- . The plan supports targeted location-based interventions to mitigate the risks of coastal storm surges and discards proposals for large-scale harbor-wide storm surge barriers. A combination of different strategies represents strong recognition that there is no one single solution to protect New York City against future coastal storms.
- . The SIRR proposes a combination of hard engineering projects with green infrastructure interventions to increase water-edge elevation, minimize upland wave zones, and protect against storm surges. These areas will double as open space and recreation amenities under normal weather conditions. Mitigation projects can provide diverse employment opportunities, with design, construction and maintenance of green infrastructure projects possibly leading to local green jobs.
- . Integrated Flood Protection Systems and gates/levees proposed in the SIRR Report reflect the type of strategies, like greenways, that community groups have proposed in the South Bronx and Sunset Park.
- . Storm surge barriers proposed for Newtown Creek and (possibly) the Gowanus Canal will prevent “backdoor flooding” and improve resiliency to storms.
- . The SIRR emphasizes the need to work with the Army Corps of Engineers on strategies for beach nourishment, dune construction, and shoreline protections in vulnerable locations, such as portions of Staten Island and the Rockaways.

## c. Water management & utilities

- . In many sections, the SIRR plan creates multiple strategies to harden public infrastructure and utilities at key facilities, including electric, waste water and solid waste infrastructure, among others.
- . The SIRR suggests strategies to bring third parties into compliance with resiliency priorities.

## d. Buildings and critical networks (transportation, food distribution, energy)

- . Subject to available funding, the City proposes a \$1.2 billion program to provide incentives to owners of existing buildings in the 100-year floodplain to make resiliency investments and will lobby for flood protection measures beyond only raising buildings to qualify for flood insurance benefits under National Flood Insurance Program.
- . The SIRR recommends retrofitting public housing units damaged by Sandy to increase resiliency and proposes the repair of public housing developments damaged by Sandy. The NYC Housing Authority (NYCHA) will also undertake a planning process to identify additional resiliency investments in developments that are vulnerable to weather-related events, even if they were unaffected by Sandy.

## Special Initiative for Rebuilding and Resiliency (SIRR): Positive accomplishments

. In addition, the SIRR recommends expanding the city's Select Bus Service (SBS) and ferry services; to improve temporary public transit services in the event of subway suspensions. It also proposes a comprehensive study of the city's food distribution, highlighting the need for continuous power at key food distributions and retail points, as well as to expand the Food Retail Expansion to Support Health (FRESH) subsidy program and other food procurement programs.

### **e. Economic recovery**

. SIRR acknowledges vulnerability of small businesses and suggests resiliency measures at healthcare institutions; National Emergency Grant Fund (NEG) leading to 1,000 hires for recovery efforts; expansion of Workforce One Center in the Rockaways; and the expansion of Minority and Women-Owned Business Enterprise (MWBE) opportunities.

### **f. Environmental protection and remediation**

. The City will finish the NYC Department of City Planning's (DCP) Open Industrial Uses Study and the Mayor's Office of Long-Term Planning and Sustainability (MOLTPS) will develop a catalogue of "best practices" for storing enclosed hazardous substances in flood-prone industrial areas.

. The SIRR introduces strategies to accelerate brownfield clean-up, and the exploration of strengthened cleanup standards for industrial waterfront brownfields vulnerable to the re-suspension of contaminants.

### **g. Public health**

. The SIRR plan introduces regulatory requirements to improve the design and construction of hospitals and residential health care facilities — including hardening strategies and the relocation and redundancy of A/C systems & electric systems.

. The SIRR announces financial incentives (sales tax waivers, grants, and interest-free loans) for the hardening and retrofitting of a limited number of nursing homes and adult care facilities, as well as for other primary care and mental health clinics to support the installation of emergency power solutions for A/C systems & electric systems.

### **h. Community preparedness and response**

. The SIRR recognizes the role of community-based organizations in conducting outreach to vulnerable communities, and announced the creation of a pilot program to identify community needs and create an action plan for increasing local capacity. The SIRR also includes the expansion of the NYC Office of Emergency Management's (OEM) Community Emergency Response Teams (CERT), as well as implementation strategies to engage young adults in City's disaster preparedness efforts, as part of a subsidized jobs program.

. The City plans to expand emergency services portals, and plans to develop an improved emergency notification contact system.



# Special Initiative for Rebuilding and Resiliency (SIRR): Challenges & concerns

The following section identifies challenges and concerns regarding the SIRR report's failure to address priorities of the Sandy Regional Assembly Recovery Agenda.

## **a. General observations:**

. There have been no significant provisions for public comment on the SIRR plan, besides the initial public workshops held at the beginning of the planning process in a limited number of communities.

. The SIRR plan does not allow for any type of community input on the SIRR-proposed neighborhood-based projects and proposals. Therefore, local residents and workers in these areas will have to rely on the formal public review processes — to the degree public review even applies — that will be triggered once these proposals are formally launched, often making it too late to substantially affect their course or promote transparent and democratic decision making.

## **b. Sandy Regional Assembly Recovery Agenda Goal 1: Integrate regional rebuilding efforts with local resiliency priorities**

The Sandy Regional Assembly Recovery Agenda establishes the goal to develop local and regional scale solutions that align climate adaptation and disaster planning as part of an inclusive planning process to ensure that the recovery process benefits the needs of all communities, including those that were not affected by Sandy, but are vulnerable to future storms.

### Challenges and concerns:

. The SIRR introduces integrated flood protection systems in the neighborhood of Red Hook, Brooklyn; storm surge barriers around Newtown Creek and the Gowanus Canal; and off-shore breakwaters and green in-water infrastructure projects in Bay Ridge and Sunset Park, Brooklyn. However, there are no integrated flood protection systems addressing the vulnerability of the mixed-use blocks of the Sunset Park working waterfront — as suggested in the Sandy Regional Assembly Recovery Agenda recommendation to implement the Sunset Park Greenway/Blueway (see *the Sandy Regional Assembly Recovery Agenda*, [www.nyc-eja.org](http://www.nyc-eja.org)).

. Even though the SIRR has suggested integrated flood protection systems to address the vulnerability of the Hunts Points peninsula in the Bronx, other South Bronx neighborhoods such as Port Morris are also vulnerable to storm surge, but are not receiving similar attention.

. Even though the SIRR has recognized the vulnerability of the Hunts Point peninsula to flooding and storm surge by including an Integrated Flood Protection System, the vulnerability of the Hunts Point Food Distribution Center to potential hazardous exposures from industrial facilities/sites in the South Bronx has not been addressed.

## **c. Sandy Regional Assembly Recovery Agenda Goal 2: Address public health impacts on vulnerable communities**

The Sandy Regional Assembly Recovery Agenda establishes the goal to maintain the health and safety of residents, workers, and first responders before, during, and after disasters as the highest priority.

### Challenges and concerns:

. Overall, the plan doesn't include substantive information on the public health impacts of Superstorm Sandy on vulnerable communities, workers, first-responders or recovery workers, nor the long-term effects of post-traumatic stress.

. The SIRR doesn't mention the need to develop a participatory investigation of public health risks associated with potential exposures to industrial clusters of hazardous substances and toxic chemicals, and the opportunities to mitigate them.



## Special Initiative for Rebuilding and Resiliency (SIRR): Challenges & concerns

- . The SIRR fails to address that potential hazardous exposures in Significant Maritime and Industrial Areas or SMIAAs (whether in unenclosed sites or enclosed industrial facilities) as a result of a range of climate change impacts (not just flooding) such as storm surge, strong winds, sea-level-rise and erosion. Moreover, the SIRR should address the manufacturing, handling and transfer of hazardous substances, not just their storage.
- . The SIRR plan does not provide a clear indication of where the hazardous exposures that the NYC Department of Environmental Protection (DEP) reported post-Sandy took place. This level of uncertainty compromises the health and safety of communities living and working in these areas, where residents and workers may have been exposed during and after the storm.
- . SIRR proposes strategies to safeguard exposed substances in open industrial areas vulnerable to flooding focus on zoning text amendments and additional legislation, but does not address the need to improve the enforcement of existing regulations and to coordinate the work of City, State, and federal agencies. This is critical because the industrial performance standards found in NYC's zoning resolution have not been updated since 1961 — well before the creation of the US Environmental Protection Agency (US-EPA) and major environmental legislation.
- . Provisions in the plan to maintain and secure access to health care during and after emergencies are restricted to preventing physical damage and maintaining operations. However, there are no substantive strategies to increase access to health care for uninsured populations in vulnerable areas, such as low-income neighborhoods and communities of color.
- . The SIRR plan does not address the existing vulnerabilities of environmental justice communities. For example, outpatient services for chronic conditions (like asthma or diabetes) are critical to the treatment of residents in low-income communities of color. However, the SIRR plan indicates that outpatient services were among the first services interrupted by the health care system during Sandy, but does not address the need to maintain outpatient services during emergencies.

### **d. Sandy Regional Assembly Recovery Agenda Goal 3: Expand community-based climate change planning**

The Sandy Regional Assembly Recovery Agenda establishes the goal to support community-based organizations' efforts to address climate change adaptation, mitigation and disaster response, and resiliency education & research, through funding and resources to help build local capacity to plan for and respond to future emergencies.

#### Challenges and concerns:

- . The pilot program to identify and address gaps in community capacity for disaster preparedness needs to be neighborhood-specific; looking at one community as a prototype is insufficient.
- . Moreover, the SIRR's analysis of community capacity should not be limited to outreach activities. Instead, it should include community-based planning and research, community efforts to act as first-responders and community-led recovery work, among other Sandy efforts undertaken by local communities.
- . The SIRR does not address recommendations to support community-based efforts to create permanent Community Resilience Centers for Climate Adaptation/Disaster Relief/Evacuation Coordination.
- . The creation and improvements to existing information systems documenting the location of vulnerable populations and critical local stakeholders featured by SIRR rely too much on digital online infrastructure.
- . The type of interventions proposed by the SIRR to improve information resources fails to integrate the on-the-ground experience and presence of community-based organizations that are already addressing the need to maintain local registries and strengthen community networks of support that vulnerable populations require.

# Sandy Regional Assembly proposed capital projects & plans

These Adaptation/Resiliency Capital Projects focus on shovel-ready projects to increase disaster resiliency in waterfront areas and build on pre-existing community-based initiatives and partnerships with local governments. Projects were identified using the following criteria:

- Must be in storm surge-vulnerable waterfront communities and have adaptation/resiliency benefits, either as green infrastructure (GI) or increased buffers for upland communities;
- Must be in part supported/planned previously with City/State government; and
- Should have already received some previous government financial support, either through design work or actual construction in earlier phases.

However, only a few of these projects have been incorporated into the SIRR plan. We urge government authorities to consider incorporating local community priorities presented in the Sandy Regional Assembly Recovery Agenda projects below.

## a. Adaptation/resiliency capital projects for storm surge vulnerable communities

The following table summarizes the preliminary assessment of which projects have been incorporated in the SIRR report.

Projects	Incorporated in SIRR?	Status of the project in the SIRR
1. Sunset Park Greenway-Blueway	No	No such open space neighborhood-level intervention for Sunset Park’s working waterfront.
2. South Bronx Greenway	Partially	No direct mention, although Integrated Flood Protection System proposed for Hunts Point may include sections of it (SIRR, p. 418).
3. Bronx River Greenway	Partially	No direct mention, although Integrated Flood Protection System proposed for Hunts Point may include sections of it (SIRR, p. 418). In Addition, Bronx River wetland restoration announced (SIRR, p. 426).
4. Create Sunset Park Upland Evacuation Connector Project	No	No mention.
5. Implement Sunset Park 4th Avenue Redesign	No	No mention.
6. Incorporate Climate Adaptation measures into Bush Terminal Piers Park	Partially	Listed as continuing effort toward new park and open space project for BK-QN Waterfront, but no mention of climate adaptation measures (SIRR, p. 268).

## Sandy Regional Assembly proposed capital projects & plans

7. Rebuild the Gansevoort Marine Transfer Station in the West Village (next to Hudson River Park)	<b>No</b>	No mention, besides general initiative to harden critical city-owned facilities (unfunded) (SIRR, p. 429).
8. Finish construction for Bushwick Inlet Park	<b>Partially</b>	Listed as continuing effort toward new park and open space project for BK-QN Waterfront, but no mention of climate adaptation measures (SIRR, p. 268).
9. Upgrade NYC DEP Port Richmond Sewage Treatment Plant	<b>Partially</b>	Subject to available funding, the City will protect these critical treatment facilities by raising or flood-proofing assets that are critical to the treatment process, constructing barriers, improving waterfront infrastructure, or implementing redundancy measures to avoid failure of these critical treatment systems (SIRR, p. 394). In addition, DEP will adopt a wastewater facility design standard for storm surge and sea level rise (SIRR, p. 427).
10. Build rain garden and swale on NYCHA property	<b>No</b>	No mention, besides general study for resiliency initiatives in ground-floor NYCHA buildings (SIRR, p. 430).
11. Reconstruct the Long Beach, Boardwalk (Long Island)	<b>No</b>	Not applicable (SIRR Report only addresses NYC projects).
12. Create Minish Park/ Passaic Riverfront (NJ)	<b>No</b>	Not applicable (SIRR Report only addresses NYC projects).
13. Repair/upgrade Passaic Valley Sewerage Commission (NJ)	<b>No</b>	Not applicable. (SIRR Report only addresses NYC projects).
14. Creation of Newark Riverfront Park (NJ)	<b>No</b>	Not applicable (SIRR Report only addresses NYC projects).

## Sandy Regional Assembly proposed capital projects & plans

### b. Capital, Planning & Other Priorities

The following table summarizes the preliminary assessment of which projects have been incorporated in the SIRR report.

Projects	Incorporated in SIRR?	Status of the project in the SIRR
1. Support Community Resilience Centers in Vulnerable Waterfront Communities	<b>No</b>	No direct mention of such comprehensive community resources. However, SIRR introduces Community Design Centers, but just for property owners, and specifically for design solutions for reconstruction (SIRR, p. 420). In addition, introduces Center for Resiliency and Restoration, to be managed by the NYC Department of Parks and Recreation (DPR) – but seems to be an agency-exclusive operation (SIRR, p. 427).
2. Industrial Waterfront study for NYC’s Significant Maritime and Industrial Area’s (SMIA’s) as well as NJ’s industrial waterfronts in Newark and Elizabeth	<b>Partially</b>	Commitment to finish the NYC Department of City Planning (DCP) Open Industrial Uses Study (OIUS) and expand scope to enclosed facilities through new Mayor’s Office of Long-Term Planning and Sustainability (MOLTPS) study. In addition, the City will launch a sales tax abatement program directed at industrial businesses to help subsidize the cost of making flood resiliency improvements, implemented through the IDA. The program will prioritize 1- to 2-story buildings with more than 4 feet between their actual ground elevation and the applicable base flood elevation (BFE) (SIRR, p. 85). Announcement of general building code amendment to improve wind resiliency. However, emphasis on hardening and particularly against flooding in all cases above leaves out possibility for green infrastructure solutions. No environmental protection or public health efforts assessing post-Sandy contamination in public spaces.
3. Encourage technical assistance grants for policy and planning networks and community-based organizations with histories of effective advocacy partnerships promoting environmental justice, resiliency and sustainability with the most vulnerable communities	<b>No</b>	No direct TA grants specific for community-based organizations, other than the Resiliency Technology Competitions (i.e. Neighborhood Game Changer Competition, Energy Infrastructure Resiliency Competition. P. 85. Announcement of pilot program to identify and address gaps in community capacity, but no direct mention of funding for partnerships with community-based organizations (SIRR, p. 424).



## Sandy Regional Assembly proposed capital projects & plans

4. Expedite/prioritize remediation of Superfund sites and badly contaminated brownfields in waterfront areas vulnerable to storm surge	<b>Partially</b>	Efforts to accelerate brownfield cleanup in 100-year floodplain to prevent release of pollutants. In addition, exploration of strengthened cleanup standards, technical assistance in the form of resiliency audits to encourage voluntary BMPs. However, all resources focus on developers, and do nothing about community awareness/preparedness (SIRR, p. 203).
5. Rebuild sand dunes in vulnerable waterfront neighborhoods	<b>Yes</b>	Funding secured through ACE and FEMA for beach nourishment and secondary dune systems in Rockaway Peninsula and Staten Island (focus on East shore) (SIRR, p.417).
6. Provide emergency generators for all NYCHA properties in vulnerable waterfront areas:	<b>Partially</b>	NYCHA will also begin a planning process to identify targeted resiliency measures (for example, raised boilers and electrical switch gear) to address vulnerability throughout buildings in its portfolio in the 100-year floodplain. Particularly, retrofit public housing units damaged by Sandy and increase future resiliency – install backup generators in vulnerable buildings; launch planning efforts for undamaged but vulnerable buildings; complete repairs and resiliency retrofits in 40% of vulnerable buildings (SIRR, p. 420). In addition, Elevation or flood-proofing of this equipment \$100 million reserved for affordable housing projects. The City will pursue CDBG funds as well as Federal Hazard Mitigation Grant Program (HMGP) funding. Large buildings will have to comply with Core Flood Resiliency by 2030 (but not NYCHA) and affordable housing may be eligible for waivers or alternative approaches. SIRR also fails to articulate a local resiliency upgrade jobs strategy – it should highlight the opportunity and invoke NYCHA's responsibility under HUD Section 3 to ensure local NYCHA resident hiring for local projects.
7. Assemble, store and distribute “go bag’s” for emergency evacuation	<b>No</b>	No mention
8. Relocate Vernon C. Bain Prison Barge	<b>No</b>	No mention

# Policy recommendations for the federal Hurricane Sandy Rebuilding Task Force

The federal Hurricane Sandy Rebuilding Task Force should require that New York City presents detailed documentation that recovery and resiliency planning operations meet the following criteria.

## **a. Demonstrate that recovery and resiliency planning efforts integrate community priorities and use transparent and democratic decision-making processes:**

- . Identify technical and financial resources that allow for grassroots engagement. This should include technical assistance grants for policy and planning networks and community-based organizations with histories of effective advocacy partnerships promoting environmental justice, resiliency and sustainability with the most vulnerable communities.
- . Honor and expand existing community engagement policies by guaranteeing an inclusive decision-making process, with multiple opportunities for community oversight.
- . Lengthen public comment periods to longer than the current fourteen days and incorporate public engagement opportunities during the development of proposals to allow communities to participate and hold recovery projects accountable.
- . Provide regular updates on projects in a public manner (website, community board meetings, etc.) and disseminate information describing the allocation of federal funds, and public status reports on the implementation of recovery and resiliency building projects.
- . Secure local jobs by enforcing HUD's Section 3 mandates of employing local businesses and workers for recovery, and requiring that wages and benefits are paid at the established industry standards. We encourage officials to consider a Sandy Recovery WPA-style public works/jobs program to train and employ local workers in clean energy, disaster preparation, and green infrastructure jobs, in addition to the maximization of Minority and Women-Owned Business Enterprise (MWBE) opportunities.

## **b. Guarantee that NYC Community Development Block Grants (CDBG) integrate regional rebuilding efforts with local resiliency priorities:**

- . Incorporate existing and future community-based planning initiatives that expand adaptation and resiliency strategies into the coastal protection strategies proposed by the SIRR. Examples of neighborhood-specific planning initiatives include the Sunset Park Greenway-Blueway, South Bronx Greenway, Bronx River Greenway, as well as the climate adaptation strategies proposed for Bushwick Inlet Park, Bush Terminal Piers Park, Sunset Park Upland Evacuation Connector Project, Sunset Park 4th Avenue Redesign, rebuilding of the Gansevoort Marine Transfer Station, and upgrades to the Port Richmond Sewage Treatment Park, among other initiatives (see *Sandy Regional Assembly Recovery Agenda*, [www.nyc-eja.org](http://www.nyc-eja.org)).
- . Implement existing community plans that already provide climate adaptation/resiliency strategies, such as Brooklyn's Sunset Park's and Williamsburg's 197-a plans and the Bronx's Hunts Point Vision Plan.
- . Fund Climate Adaptation/Disaster Relief/Evacuation Coordination Centers where individuals can get help and information before, during, and after an emergency. Centers should be developed in partnership with grassroots community-based organizations, and could serve as a repository of information to facilitate tracking population with special needs; enabling family members and guardians to locate who is using or has used special medical assistance; and/or locate required medical, emergency management and recovery resources.
- . Eliminate displacement by certifying that any project or program initiated as part of the recovery process will not

## Policy recommendations for the federal Hurricane Sandy Rebuilding Task Force

lead to a reduction of the supply of housing affordable to low and moderate-income residents in any neighborhood. In addition, the City's Department of Homeless Services should be required to make its shelter system more sustainable and plan for long-term housing for those currently displaced, ensuring that tenants are guaranteed the right to return to public housing post-evacuation (via legislative or regulatory actions).

. Develop an independent analysis of the New York City Housing Authority's response to Sandy, that includes recommendations for improvement and constituents' observations. Allocation of rebuilding funds must strengthen resiliency in public housing buildings vulnerable to storm surges by developing risk assessments of existing conditions, identifying vulnerable buildings, conducting building-by-building resiliency audits, and retrofitting the building stock, as required.

. As the SIRR failed to articulate a local NYCHA resiliency upgrade jobs strategy, the federal Task Force should highlight the opportunity and invoke NYCHA's responsibility under HUD Section 3 to ensure local NYCHA resident hiring for local projects.

### **c. Ensure that future New York City recovery and resiliency planning efforts address the needs of the most vulnerable communities:**

. Conduct a Community Health Investigation to determine health impacts of post-Sandy contamination and health hazards, including an analysis of the impacts on community first responders and recovery workers that reflects the long-term health impacts of post-traumatic stress disorder. This analysis should be developed in collaboration with community-based organizations. The analysis should analyze cumulative impacts to workers and residents of coastal neighborhoods (communities of color, low-income communities, seniors, children, youth, persons with disabilities, patients requiring permanent medical assistance, immigrants, linguistically-isolated households, etc.) and workers of industrial waterfront communities that are vulnerable to storm surge.

. Publish a detailed report of the NYC Department of Environmental Protection's (DEP) post-Sandy inspection of facilities in compliance with Local Law 26 of 1988 (the "NYC Right-to-Know Law") that reported spills of hazardous substances following Sandy. This should include the location, type of substances and volume, for the reported spills and measures taken to mitigate them (SIRR, p. 201).

. Document and assess the public health risks associated with potential exposures to hazardous substances and toxic chemicals handled, manufactured and transferred— not just stored — in industrial facilities and sites vulnerable to climate changes impacts. Address a range of climate change impacts (not just flooding) including storm surge, high winds, and sea-level-rise in industrial waterfront neighborhoods (Significant Maritime and Industrial Areas). This process should take place as a collaborative effort between community, industry and government. For example, the City should engage residents and train recovery workers, community first responders, and volunteer clean-up workers, on protocols for hazardous materials and contaminants to prevent environmental hazards after disasters.

. NYC must complete its update of the Waterfront Revitalization Program (the City's Coastal Zone Management Plan) begun 10 months prior to Sandy's landfall. Such reform must address the vulnerability of NYC's Significant Maritime and Industrial Areas to climate change impacts through the following policy recommendations: 1) Require risk assessment to climate change impacts in planning/ design of all industrial projects on the coastal zone; 2) Mandate safe & responsible use of hazardous materials and toxic chemicals; 3) Protect local industrial jobs and businesses discouraging any actions that reduce land zoned for manufacturing and introduce non-industrial, non-water-dependent uses; 4) Protect & restore wetlands and other ecologically sensitive areas located inside or immediately adjacent to the South Bronx, Sunset Park and Newtown Creek SMIA's; and 5) Require waterfront public access, unless proven infeasible and unsafe.

