



COMMUNITY DEVELOPMENT PROJECT

**Testimony of Paula Z. Segal
to the New York City Council Committees on
Governmental Operations, Economic Development & Transportation
April 17, 2019**

Thank you for the opportunity to submit testimony on the bill to create an office of the waterfront (Intro 982-2018) . My name is Paula Segal; I am a senior staff attorney at the Community Development Project (CDP), a non-profit legal services organization that works with grassroots and community-based groups in New York City to dismantle racial, economic and social oppression. My practice, Equitable Neighborhoods, works with directly impacted communities to respond to City planning processes and private developers, helping to make sure that people of color, immigrants, and other low-income residents who have built our city are not pushed out in the name of “progress.”

I am submitting these comments on behalf of CDP. They are informed by our work with residents and grassroots organizations that are based on NYC’s waterfronts and have done decades of work directed at making sure that waterfront access and activities are responsive to the needs of current residents and those who lived through decades of neglect and toxic uses of waterfront neighborhoods. These include CAAAV: Organizing Asian Communities, Good Old Lower East Side (GOLES), Tenants United Fighting for the Lower East Side (TUFF_LES), the Staten Island Coalition for Wetlands and Forests and many others.

While we agree that an office of the waterfront is long overdue given the unique history of NYC’s waterfronts and the overlapping permitting regimes that apply to waterfront development and access. Yet the bill as drafted does nothing to embed resident representation and interests in waterfront permitting. We would like to see an amendment that requires that the newly created office to be in direct contact with local community-based organizations and community boards.

It should also require that any permits or other approvals that the office facilitates be consistent with community-generated plans like *A People's Plan for the East River Waterfront*, available at <https://caaav.org/publications/PeoplePlanExeSummary.pdf>.

We are really pleased to see that the definition of the geographic area that the new office will have jurisdiction over is expansive and includes ocean, estuary, harbor, river, tidal strait, bay, basin, cove, stream, pond and lake. We suggest “wetland” be added to this list to encompass the freshwater and tidal wetlands that fall under the jurisdiction of the Department of Environmental Conservation and the Army Corps of Engineers.

As you know, NYC’s waterfronts are recently sites where many new residential and commercial developments are being built and planned. We would like to see the definition of “waterfront use” that triggers the authority of the new office to be extended to all developments that impact the waterfront, not just those that “require direct access or proximity to the water in order to function” or have “a primarily recreational, cultural or retail function whose location on the waterfront would add to public use and enjoyment of the water’s edge.” This limited purview misses an opportunity to create an effective system for managing the waterfront as a public asset.

Thank you so much for all you do everyday. We look forward to working together towards equitable waterfront development.

For further information, contact:

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