

TWELVE FOR 2030

Responses to plaNYC: A GREENER, GREATER NEW YORK

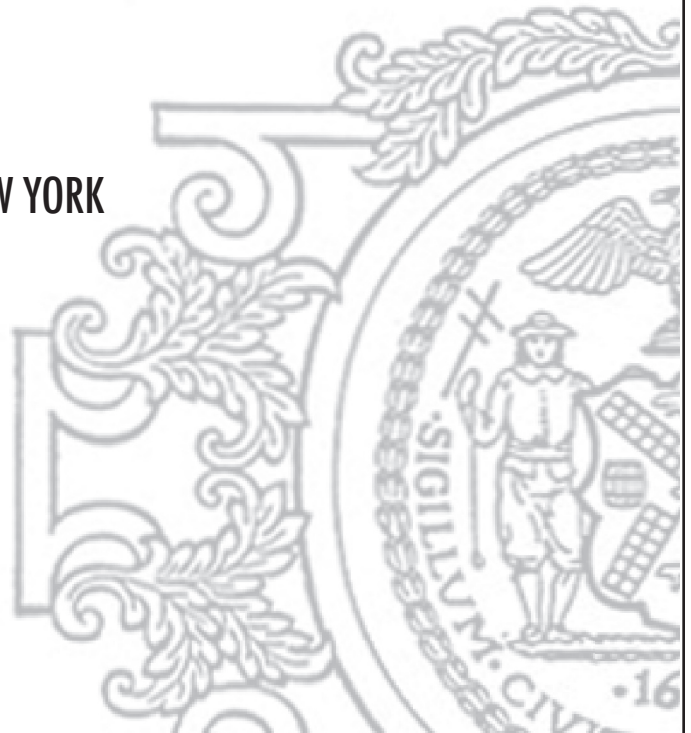
compiled by

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My fellow New Yorkers:

On Earth Day this year, Mayor Bloomberg unveiled a broad and ambitious plan to make New York “the first environmentally sustainable 21st Century city.” Like many New Yorkers who have long advocated for innovative, long-term solutions to the environmental, transportation, and development problems we face, I am encouraged that the Mayor is rising to meet the challenge head-on. With the city expected to gain approximately 1 million new residents by 2030, action is not only advisable – it is necessary.

A plan, however – even one as far reaching as the Mayor’s – is just a first step. For the 127 proposals in plaNYC to be realized in a timely and effective manner, the administration will have to work together with elected officials, experts, and advocates to develop strategies for implementation and to engage New Yorkers in a discussion of how the proposal will affect their lives.

The purpose of this compilation of articles is to facilitate a dialogue among the administration, advocates for environmentally sustainable urban planning, and the people of New York City. In the pages that follow, you will find expert opinions on several key aspects of plaNYC:

Transportation Alternatives on curbside parking and bicycle and pedestrian street safety

Andrew Albert on expanding subway capacity

Dr. Robert E. Paaswell on traffic congestion and congestion pricing

New York Climate Rescue on energy issues and global warming

Sustainable South Bronx on brownfield cleanup and local water quality

New Yorkers for Parks on park and street tree maintenance

Hilary Baum on sustainable food systems

The Cloud Institute for Sustainability Education on environmental education in city schools

Nature Network on continuing discussions around wildlife habitat and waterfront development issues

Tom Angotti on community-based land use and environmental planning

The Association for Neighborhood and Housing Development on affordable housing

My hope is that these individuals and groups will be joined by many others in an ongoing conversation about how plaNYC can be improved and implemented over the years. For our city to become truly sustainable, we will need a plan that addresses workforce development, public benefits, education, and care for seniors and the disabled. New Yorkers in all five boroughs and every walk of life deserve a safer, healthier, more livable city. We all share the responsibility of meeting this goal by the year 2030.

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The opinions contained herein are not necessarily the opinions of the Office of the Public Advocate.
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Open up NYC streets for pedestrians, cyclists, & buses

Transportation Alternatives

Transportation Alternatives, a 5500-member, NYC-area non-profit citizens group, was founded in 1973 during the explosion of environmental consciousness that also produced the Clean Air and Clean Water Acts and the Environmental Protection Agency. TA seeks to change New York City's transportation priorities to encourage and increase non-polluting, quiet, city-friendly travel and decrease — not ban — private car use.



If you think our transit system needs expanding or our streets need fewer cars, then there is a lot to love about the 16 “green” transportation initiatives in the mayor’s *plaNYC: A Greener, Greater New York*.

While many specifics have yet to be announced, the plan includes solid outlines for an \$8 London-style congestion pricing system; \$50 billion in transit improvements; and better bicycling, walking, and ferry services.

Even for the 5 percent of outer-borough workers who now drive to Manhattan, there is a lot to like. Drivers’ transit options are only going to get better, and everyone will benefit from cleaner air and thinner traffic.

In the transportation world, it is a widely known (if seldom acted upon) fact that cars are toxic to dense cities. Car drivers consume 10 times more valuable street space than commuters traveling by bus, bicycles, or on foot. The city also faces an influx of 1 million more residents by 2030, along with an estimated 83 percent increase in truck traffic by 2020 over 1998 levels. And major development projects, such as Atlantic Yards, are also poised to unleash a torrent of transportation demand. All this being true, the mayor should instruct his new Department of Transportation commissioner to waste no time in advancing completion dates for the less capital-intensive aspects of the plan, which cede more street space and priority to bus riders, pedestrians, and bicyclists. Things that can

be done quickly include: adding express bus lanes; increasing pedestrian crossing times; and transforming more parking spaces into wider sidewalks and bike lanes. The necessity of carbon reduction only adds to this urgency.

Major funding for the plan’s linchpin — a \$50 billion laundry list of transit improvements — depends on \$500 million in annual revenue expected from the Manhattan congestion charge. Therein lies the plan’s potential undoing. For the congestion charge to become a reality, it first must gain the approval of a gauntlet of state legislators who, with a nudge from the powerful parking and automobile lobbies, could easily block it.

If Mayor Bloomberg and Deputy Mayor Dan Doctoroff want to ensure the security of their green transportation legacy, they should pursue a green transportation solution that is conspicuously absent from their plan. This solution could at once relieve traffic congestion citywide, raise much-needed revenue for street improvements, and be implemented without the approval of the state legislature. The solution? A citywide increase in the price of curbside parking.

Last year, the press reported that most Manhattan-bound drivers drive out of choice, not necessity. A more recent study by Schaller Consulting uncovered the reason why: most drivers do not pay for parking. As any transportation expert will tell you, the carrot of free

parking is too irresistible for drivers to refuse, even when they have decent transit options.

Government workers have coveted (and often counterfeit) parking placards. All drivers have access to a bounty of free and \$1.50-per-hour spaces, even if they have to circle the block for 40 minutes to find a vacant one. Because the under-priced curbs are at or near saturation, cruising for parking spaces accounts for up to 45 percent of all traffic on city streets.

By increasing metered parking to a level that frees up vacancy and reduces cruising for parking spaces, by charging residents for preferential parking on public streets and by cleaning up the rampant misuse and abuse of city-issued parking permits, Mayor Bloomberg could redress a root cause of traffic congestion while generating a windfall to fund street improvements.

Mayor Bloomberg and Deputy Mayor Doctoroff deserve a lot of credit for mounting a coordinated attack on the big plagues of the 21st Century city: traffic congestion, climate change, and increasing population. That their plan manages to wed the audacity of Robert Moses with the pedestrian populism of Jane Jacobs makes it all the more impressive.

With a new generation of street and transit improvements funded by congestion pricing, Bloomberg and Doctoroff are poised to move mountains, if only they can move Albany. As a hedge, they should tackle what they can clearly control: New York City's broken parking policy.)

“City Ticket” could improve mobility on NYC transit

Andrew Albert

Andrew Albert is the Chairman of the New York City Transit Riders Council, a group that represents the interests of NYC bus and subway riders. In 2002, he was appointed to a non-voting seat on the Board of the Metropolitan Transportation Authority. The NYC Transit Riders’ Council was created in 1981 by the New York State Legislature. It meets on a monthly basis to discuss issues of importance to transit users.



Mayor Bloomberg’s plan for improving transportation in New York City by the year 2030 proposes a number of innovative projects that should be seriously considered for implementation.

The plan’s transportation section begins with the story of Brian Block, whose commute from Cambria Heights, Queens to Manhattan has been a struggle for more than 20 years. Mr. Block takes a bus to the Parsons/Archer hub in Jamaica, and then the E train to Manhattan — a two hour commute. The Transit Riders Council has championed, with some success, a “City Ticket” pilot program that could help residents with commutes similar to Mr. Block’s.

A City Ticket pilot program would begin to allow residents of outer boroughs to ride LIRR and Metro-North trains for a flat fee that is just a little higher than the current subway fare. We envisioned this City Ticket as being used at all off-peak times. We also envisioned the pilot as a precursor to a built-out program that would allow customers to use any mode of transport in a given zone. Under such a system, Mr. Block, instead of having to take a slow bus to Jamaica and then an over-crowded E train to Midtown, could use the LIRR at a station close to his home — either Laurelton, Locus Manor, or St. Albans — to get to Manhattan in a fraction of the time. This City Ticket proposal should be considered as one more tool for improving commutes.

The mayor’s plan, in part, is predicated on creation of the Sustainable Mobility and Regional Transportation Financing Authority, or SMART. Some critics may see this as another faceless bureaucracy, and it’s questionable whether the state would be willing to contribute funds to a new organization. There’s a risk that SMART would face the same political challenges as the MTA’s Capital Program, with legislators demanding their slice of the pie in exchange for approval. These concerns will need to be dealt with through ongoing dialogue with transportation advocates and policy makers as the mayor moves to implement the plan. A new financing authority must avoid perpetuating the very problems it would be created to solve.

The mayor’s plan includes the Lower Manhattan JFK Rail link, a costly project with limited support at the city and state level. Instead of insisting on the airport rail link, the mayor and the MTA should seriously consider a NYC Transit Riders Council proposal to replace the Brooklyn branch of the LIRR with a transit line to Southeast Queens. This area has long been promised its own transit branch. When East Side Access starts and LIRR trains begin running to Grand Central Terminal, the Brooklyn branch of the LIRR will likely become a shuttle. The LIRR already has stated that it will not run trains to three western terminals, meaning that Penn Station and Grand

Central will be their western terminals, leaving Flatbush Avenue with just a shuttle service from Jamaica. Converting this line to a transit line will give thousands more customers access to a service that would whisk commuters from a new station in Springfield Gardens to Downtown Brooklyn in just a half-hour.

Moving forward, the plan also should incorporate efforts to make commuter rail lines more accessible to New York City residents through new stations. This could be a relatively low-cost way of serving riders in areas that subways don't reach. Again, a new ticket structure allowing customers to ride whatever mode they choose — subway, railroad, ferry, or bus — in a given zone would be an important first step in improving circulation in our great metropolitan area.

Though the Second Avenue Subway will do much to improve mobility, especially for users of the overcrowded Lexington Avenue line, the Transit Riders Council is concerned about connectivity with the rest of the system. The MTA has indicated that it will order 75-foot-long cars for the Second Avenue line, which would make connections to lines in the Bronx and Brooklyn impossible. Cars of that length will not work on the "A" division (IRT) and will only be able to run on some segments of the "B" division (IND-BMT). In planning today, the city needs to ensure that decisions made today will allow for greater system integration tomorrow.

The plan points to the proposed No. 7 line extension as one means of increasing access to transit in under served neighborhoods. However, the plan only commits to building one station at the line's new terminus near the Javits Convention Center. Though holding off on construction of an additional station at Tenth Avenue would cut down on up-front costs for extending the No. 7 line, building the station at a later date could, by some estimates, cost the city twice as much. With so much more development planned near the site of a future Tenth Avenue stop, construction of a second station should not be postponed. Taxpayers shouldn't have to cover the cost of a project that could

have been cheaper to build earlier on.

Co-Op City is one of the places described in the 2030 plan where more residents choose to drive to work instead of taking transit. Assuming they are going to a place reachable by transit, the MTA should make jitneys available to take Co-Op city residents to Baychester Avenue station on the No. 5 line, the closest to the Co-Op City complex. There is plenty of capacity on this line at this point, as Baychester is only the second station on the line. This option could be more efficient than running express busses all the way into Manhattan.

On the other hand, building an entirely new Co-Op City station on Amtrak's Hell Gate Bridge route has long been a goal for transportation planners. Once LIRR trains use Grand Central Terminal, there should be more space available at Penn Station for trains coming from the Hudson and New Haven lines. A Co-Op City station could take advantage of these new track-use patterns and give residents of Northeast Bronx quicker access to Manhattan. In the meantime, the quickest way to implement near-term improvements to transit service would be a ticket that allows customers to ride whatever form of transit they wish within a given zone.)

Congestion: Not just a lower Manhattan problem

Dr. Robert E. Paaswell

Dr. Robert E. Paaswell has been involved in transportation operations, management, and planning since the late 1960s. He currently serves as Director of the University Transportation Research Center at the City College of New York (CUNY). From 1986 to 1989, Dr. Paaswell served as Executive Director (CEO) of the Chicago Transit Authority, the second largest system in the United States.



Every day, 2 million people enter Manhattan's core (an area roughly south of 60th Street) by subway; 180,000 enter by commuter rail; and 260,000 enter by bus. However, 1.1 million people continue to access Manhattan below 60th Street by motor vehicle. That translates into about 800,000 cars and trucks making their way into the area each day. The gridlock that results from all these commutes poses a serious environmental health threat to city residents and contributes significantly to the city's greenhouse gas emissions. There's no question that something needs to be done to change the way we use automobiles in the city.

Congestion pricing may be one answer. It has worked, to some degree, in other cities, and there's no reason to believe that it couldn't work, if implemented appropriately, in New York City. However, a series of important steps will need to be taken before we put all our eggs in the congestion pricing basket.

First, the city needs to do a better job of enforcing current laws and ordinances already aimed at reducing congestion. From cars "blocking the box" at intersections to idling trucks double-parked on busy streets, small violations can add up to big traffic snarls in every borough.

Second, the city must do a better job of defining the objectives that congestion pricing will be used to achieve. Administrators also will need to develop a set of measures that will let

us know, on a regular basis, whether congestion pricing is working to achieve those goals.

Third, for congestion pricing — or any congestion reduction measure — to work, there will need to be greater coordination between various city and state agencies on transportation issues. Cities like London have a single transportation authority with responsibility for everything from bike lanes to subways and buses. Administrative structures need to be put into place to get local and state agencies working together on the same goal: reducing the number of cars on city streets and improving travel times across *all* modes of transportation.

Finally, anyone who regularly travels on the Brooklyn-Queens Expressway or the Cross Bronx Expressway during rush hour knows that congestion is not just a Manhattan phenomenon. Though the core has one of the largest concentrations of workers in the city — or, for that matter, the world — at least 75 percent of the region's jobs are actually outside the core. Efforts to deal with congestion in Manhattan need to be expanded throughout the city.

A city-wide reduction in congestion will provide not only major public health benefits but also economic development benefits. When you reduce congestion, particularly at peak times, in a central business district, you actually make it easier for more people to get there from other places. With more people able

to access a downtown shopping district, more businesses are liable to open and more workers can get to those businesses without having to suffer through long commutes. It's a virtuous cycle that we've seen in London and other cities that have taken steps toward solving their traffic problems. With the right planning and implementation, New Yorkers also can reap the health, environmental, and economic benefits of reduced traffic congestion.)

When it comes to energy, 2030 may be too far off

New York Climate Rescue

New York Climate Rescue works to inform and mobilize citizens on the following problems: carbon pollution; greenhouse gas emissions; climate change; global warming; and environmental destruction. NYCR also seeks to propose, facilitate, and advocate for solutions to these problems, including: sustainable development; renewable energy technologies; green buildings; energy efficiency; conservation; and other related initiatives in the NY Metropolitan region.



Mayor Bloomberg and the Office of Long Term Planning and Sustainability have given us a valuable legacy—a framework for going forward. Regardless of the relative merits of any one part of the plan, key elements like the Energy Planning Board and the Energy Efficiency Authority will bring New Yorkers into the 21st Century with management systems for planning the city’s future. These are great prospects and should be enacted without delay.

We will need to continually re-visit the plan as each successive year brings more dire predictions for the effects of climate change. Though the mayor’s plan is laudable for giving us a venue and a place to start — as well as jolting us from years of inaction on this most crucial of issues — it cannot address the magnitude of changes the New York region will experience as a result of our carbon emissions.

In 2005, Dr. Rajendra Pachauri, the Chairman of the Intergovernmental Panel on Climate Change (IPCC), told an international conference that he personally believes that the world has “already reached the level of dangerous concentrations of carbon dioxide in the atmosphere” and he had come to the conclusion that the danger point established by the IPCC had had already been reached. He called for immediate and “very deep” cuts in emissions if humanity is to “survive.” Since Dr. Pachauri made these statements, the assessed time for the Arctic ice cap to completely disappear has

gone from 2100 to 2070. Even that prediction is being considered optimistic by some.¹ Since 1978, the ice cap shrunk by nearly three or four percent per decade. In the winter of 2004-2005, the Arctic lost **14 percent** of its perennial sea ice cover in a single year.² The disappearance of the Arctic ice cap will vastly accelerate the melting of the Greenland ice sheet, which, when it is completely gone, will raise ocean levels by more than 20 feet. Whether that process takes 100 years, 500 years, or 50 years, once the ice cap becomes unstable, there will be nothing we can do to stop it from disintegrating. It is fast approaching the point of no return. It doesn’t take a city planner to understand what a 20 foot rise in sea level will do to this city. Regardless of how far off such an eventuality is, if we are to stop it, we must act today.

In September of 2006, NASA scientist Dr. James Hansen said governments must adopt an alternative scenario to keep carbon dioxide emission growth in check and limit the increase in global temperatures to 1 degree Celsius (1.8 degrees Fahrenheit). **“I think we have a very brief window of opportunity to deal with climate change... no longer than a decade, at the most,”** Hansen said. According to Hansen, if the world continues with a “business as usual” scenario, temperatures will rise by 2 to 3 degrees Celsius (3.6 to 7.2 degrees Fahrenheit) and “we will be producing a different planet.”

The mayor is right that re-powering plants

will get us the efficiency that we need to reduce pollution of both greenhouse gases and conventional particulates. The mayor is right that we need to have a comprehensive plan that covers many areas, from renewables to energy efficiency, from efficient transportation to reduced sprawl.

The current plan cannot address the magnitude of climate change that the New York region will experience as a result of our current carbon emissions. It also cannot generate the radical transformation required to address Dr. Hansen's concern that "we have no longer than a decade, at most" to make changes. The plans laid out by the mayor will only take full effect decades after this timeframe has come and gone.

Only total transformation of our energy system away from fossil fuels can deliver the solution. We should start immediately on many of the key proposals in the 2030 plan. They will serve us well regardless of what steps we ultimately take.

Based on the existing plan, New York Climate Rescue makes the following recommendations:

- Shorten the time frame for achieving the goals laid out in the 2030 plan to less than ten years;
- Add simple but wide-reaching components to the energy efficiency initiatives, such as banning the sale of conventional light bulbs in New York City in favor of compact fluorescents. Similar ordinances could eliminate non-EPA Energy Star-rated air conditioners from being sold or installed within the city;
- Force all buildings in the city over 10,000 square feet to conduct an energy audit and achieve an improved level of efficiency within five years. Provide a tax credit for all owners of buildings under 10,000 square feet to do the same;
- Develop scenario planning for the complete replacement of fossil fuel energy for city government operations within the scope of the current plan;
- Create a business task force to help attract

and retain businesses in New York City that will design and build new energy infrastructure and climate-neutral energy solutions;

- Require that the baseload energy requirements of all new buildings over 10,000 square feet be met by solar and fuel cells;
- Create financial incentives for landlords and tenants to work together to improve energy efficiency and the installation of renewable energy. The Pay As You Save³ initiative provides an excellent model.
- Finally, remove Con Edison, KeySpan, and other private energy providers as decision makers in the energy management process. While their roles as observers and advisors to the process is essential, these institutions have intensive financial pressures which are legally binding. Their senior management are required to make short-term decisions for economic gain on behalf of shareholders. Such decisions are highly likely to be in opposition to the changes required by New York City to meet the climate challenges ahead.

We recognize that there are limits to what a city, even one as big and influential as New York, can do. However, this city has always been a platform for innovative ideas. The mayor has a tremendous opportunity to bring people's attention to the issue of climate change. We regret that Mayor Bloomberg has been too mild in his assessments and in his speech on this issue. It is clear from the plan, as well as the current mood of the city, that the mayor, along with the majority of citizens, may be concerned about climate change but do not recognize it yet for the disaster that it poses to the city's future.)

¹ *Global warming past 'the point of no return.'* Steven Connor, Science Editor. UK Independent. 16 September, 2005.

² *Near zero replenishment of the Arctic multiyear sea ice cover at the end of 2005 summer.* Ron Kwok. "Geophysical Research Letters" VOL. 34, L05501. 2007.; *Depletion of perennial sea ice in the East Arctic Ocean.* S.V. Nghiem, Y Chao, G. Neumann, P. Li, D.K. Perovich, T. Street, P. Clemente-Colon. "Geophysical Research Letters" VOL. 33, L17501. 2006.

³ www.paysamerica.org

Keep communities in the loop on brownfield cleanup

Sustainable South Bronx

Sustainable South Bronx works toward Environmental Justice through innovative, economically sustainable projects that are informed by the needs of the community. SSB addresses economic development, land-use, green building, energy, transportation, water and waste policy, and education in order to advance the environmental and economic rebirth of the South Bronx, and to inspire solutions in areas like it across the nation and the globe.



Mayor Bloomberg’s long-term plan for sustainability lays out a series of bold steps for ensuring that all of New York City’s contaminated properties, also known as “brownfields,” are cleaned up by the year 2030.

Most of the remaining contaminated properties in the city are concentrated in low income and minority communities that are now experiencing redevelopment at an unprecedented pace. The plan for 2030 does an honorable job of making community participation in planning for brownfield redevelopment an official city policy. It calls on the state to:

- Streamline the process of granting funds for locally-based brownfield planning through the Brownfield Opportunity Area grant program; and
- Award tax and financing incentives to developers willing to follow the guidelines set out in locally produced brownfields plans.

Both initiatives are vital to ensuring that communities will reap the benefits of future development after so many years of environmental and economic neglect. Communities whose futures will be significantly impacted by brownfield redevelopment should play a significant and meaningful role in determining what gets developed after properties are cleaned up.

We hope the city will follow up on its requests to the state with its own commitment to prioritizing development incentives for projects that honor local processes and plans. Without

concrete financial incentives from both levels of government, we fear that developers will ignore local plans as they build on the few remaining parcels of open land left in the city. In the process, the city must ensure that the incentives are easily accessible to small private and non-profit developers.

The city also needs to take advantage of the job training opportunities that result from the redevelopment of brownfields in low income communities. According to the state Department of Labor, environmental engineering technicians will have “very favorable” employment prospects over the next seven years. With no more than an associate’s degree, these technicians are earning a median salary of over \$45,000—a living wage in New York City. Giving local low-skilled workers the chance to get on-the-job training in environmental testing and soil remediation allows us to hit two economic development targets at once. These types of training-through-remediation initiatives have been piloted in Oakland, California and could easily become part of New York City’s broader workforce development policy.

In a complex city like ours, the process of cleaning up brownfields provides a different set of challenges than in rural or suburban settings. Recognizing these challenges, the 2030 plan describes some areas where cleanup standards could be less stringent in New York City than in other places. Though we agree with the

mayor on the need for a more city-specific set of cleanup guidelines, we are worried that the revisions that are proposed in the plan appear to not only reduce the environmental integrity of cleanups, but may be harmful to the health of our communities.)

Invest in green solutions to making rivers swimmable

Sustainable South Bronx



If implemented, the mayor’s plan for cleaning up our waterways over the next twenty years will have a significant impact on the health of the streams, rivers, and canals that flow into New York Harbor, not to mention the benefits to the harbor itself. However, we believe more can and should be done to improve local water quality. Indeed, we believe that 90 percent of our waterways should be open to “primary” recreation, which includes swimming, kayaking, and canoeing, by the year 2030. Unfortunately, the measures laid out in the plan, along with pending administrative decisions on the part of the Department of Environmental Protection, would only meet federal standards for “secondary” recreation.

As the 2030 plan points out, the city’s waterways have improved since the Clean Water Act was passed in 1972. Over the past thirty-five years, the city spent \$35 billion on infrastructural improvements and other initiatives that have kept pollution out of local streams and rivers. Yet the city’s combined sewage system continues to pour over 27 billion gallons of raw sewage and untreated stormwater into our waterways each year. These sewage overflows account for a number of beach closings each summer and make waterways like the Bronx River, Newtown Creek, and the Gowanus Canal inaccessible to recreation.

In order to meet state and federal regulations for improving water quality, the city is submitting a Long Term Control Plan that is due to be released within the next two months. The plan will describe the steps the city will take in coming years to keep sewage from overwhelming treatment facilities when heavy rains flush

the system with polluted stormwater runoff from rooftops, streets, and parking lots. We are concerned that the DEP will focus too heavily on end-of-pipe technologies for regulating the amount of water that flows through the system during storms. These “solutions” may fail to help the city achieve the short-term clean water standards as required by New York State, and certainly will not meet federal swimmability standards. The end-of-pipe strategies also fail to provide the same ancillary benefits that would come from investing in a more comprehensive system of source controls for stormwater.

Source controls, also known as “best management practices,” or “BMPs,” are exactly what they sound like: methods of regulating the rate at which stormwater flows through a system by controlling it at its source. Source controls include:

- Green roofs, which could absorb the rain that falls on the thousands of square miles of flat roof in the city and then slowly drain it into the sewage system;
- Street trees planted in deep and wide tree pits and Greenstreet landscaping, which could absorb the rain that falls on the thousands of square miles of paved roadways and parking lots in the city; and
- Greywater reuse systems, which provide water for toilet flushing, car washing, and irrigation.

These strategies differ from end-of-pipe solutions in that they handle stormwater as a resource; not as a waste product that needs to be disposed of. When stormwater runs through these source controls, it becomes the fuel for

a series of other processes that, taken together, could provide a great benefit to the city. Aside from capturing stormwater, green roofs can play a significant role in cooling the city and reducing energy demand by cutting down on the “urban heat island” effect. Street trees and green roofs provide the same function, in addition to trapping pollutants and absorbing carbon dioxide, a gas that contributes to global warming. As if that weren’t enough, research indicates that the process of planting and caring for trees and Greenstreets can help bring communities together and create social cohesion. That’s a lot of payback for a single investment.

Yet in order to rely on source controls as a primary method of reducing combined sewage overflows, there will need to be much greater integration between city agencies including the Department of Parks and Recreation, the Department of City Planning, the Department of Building, and, of course, the DEP. Source controls impact the policy domain of each of these agencies, and in order for the system as a whole to work, they will all need to be on the same page, aiming for the same goal.

In the plan, the City promises to put together a “best management practices” team involving relevant city agencies to figure out how best to deal with waterway cleanup. This is a good idea, but the city needs to make sure that the team: works with local organizations, such as those currently involved in the S.W.I.M. (storm water infrastructure matters) coalition; widens its scope of study; and streamlines these practices with the goal of making our waterways swimmable. A more inclusive process that brings relevant stakeholders to the table would most effectively utilize the collective knowledge that multiple sectors have to offer, and facilitate the implementation of best management practices upon completion of the plan.

The 2030 plan recognizes that swimmable waterways can only be achieved by implementing best management practices and lays out steps for increasing green roofs, street trees, and Greenstreets. However, we believe that the pilot projects described in the plan should be larg-

er and more ambitious. More than eighty best management practices for stormwater control are already at work in New York City, with the Staten Island Bluebelt standing out as the most successful example. To a great extent, these approaches have already proven themselves and are ready for more widespread implementation, including in more urbanized environments.

We’re encouraged by the city’s existing programs that discount water charges for buildings that install on-site greywater or blackwater treatment technology. Water reuse helps cut down on potable water consumption and reduce the amount of sewage running through the city’s treatment system. Moving forward, we urge the city to create pilot programs for reusing stormwater and wastewater in local manufacturing initiatives. The DEP should launch similar demonstration projects and incentives for installing other best management practices on private property. We need to follow the lead of other cities with green roofs incentives for private development such as expedited permitting, density bonuses, and split stormwater/potable water utility fees. In addition, the multiple benefits of green roofs need to be more specifically quantified, including evaluating their energy reduction benefits in terms of real-time pricing as plaNYC 2030 proposes for solar energy. As with energy efficiency, the city will need to create a focused outreach campaign to encourage private property owners to adopt innovative stormwater and wastewater management practices.

The federal government, through the Clean Water Act, has made swimmable waterways a policy priority. In recent years, more and more New Yorkers have taken advantage of these recreational opportunities. Canoeing and kayaking is on the rise throughout the five boroughs and it’s not uncommon to hear of people swimming in the Hudson. New Yorkers are demanding access to the water. The 2030 plan lays out a commitment to meeting those demands in the long-term. The city must also take concrete steps to ensure swimmability in the short term.)

Plan for upkeep of new parks, trees, and Greenstreets

New Yorkers for Parks

New Yorkers for Parks is the only independent watchdog for all the city's parks, beaches and playgrounds. For nearly 100 years, New Yorkers for Parks has worked to ensure greener, safer, cleaner parks for all New Yorkers.



We commend the administration's goal of ensuring that all New Yorkers live within a 10-minute walk of a park. This goal is very achievable by virtue of the fact that more than 75 percent of New York City already is within a walkable distance of parkland.

Community Access to School Yards

A significant majority of schoolyards operated by the city Department of Education are closed and locked during evenings and weekends. We applaud the goal of opening playgrounds and urge that all school playgrounds be open. If opened citywide, schoolyards would provide city residents with additional public space greater than that of Central Park, which occupies 843 acres. This low-cost strategy would provide much needed play space for neighborhoods across the city.

Recommendation: Cost of this considerable goal must include both construction and ongoing maintenance for it to succeed. Careful attention must be devoted to ensuring adequate maintenance and security that does not place an undue burden on custodial staff at individual schools.

Completion of Moses-era Parks

PlaNYC will include completion of six Robert Moses-era parks, including: Soundview Park, Highland Park, Drier Offerman Park, Ocean Breeze and two others. (One park in each borough plus one.) These parks will provide important open space resources to lo-

cal communities while attracting outside visitors.

Recommendation: Regional parks that serve boroughs are the hallmarks of the parks system. Finishing these projects must be a priority. The city must ensure that the Department of Parks and Recreation budget is increased to accommodate adequate maintenance and operation of these expanded park areas. Without adequate funding, park resources may be diverted from other essential park services.

Enhancing the Public Realm

This strategy seeks to expand the Greenstreets program by working to create a "public plaza" in every community district. This would likely be paired with an effort to expand the city's tree canopy cover from 24 to 30 percent with a focus on greening key boulevards and commercial strips in each borough.

Greening of the public realm not only provides essential environmental benefits to air quality, storm water runoff and reducing the Urban Heat Island effect, it has been demonstrated to increase property values, stimulate commercial activity and provide traffic calming benefits.

Recommendation: Ensure that public plazas are indeed public by keeping them physically and visually accessible and free of encroachment by the private sector, i.e., advertising and private events. Increase the budget of the city forestry department to ensure street trees, park

trees and Greenstreets have regular pruning, watering and tree guards that are essential to their survival. Street trees currently are pruned once every 10 years. With this proposed increase for forestry maintenance, street trees can be pruned once every one to eight years, thereby creating a more robust tree canopy.

What's missing for parks from plaNYC?

As New York becomes home to the next 1 million people, the real challenge will be to ensure that every New Yorker lives within walking distance of parks that are green, safe and clean and offer a variety of recreational opportunities. Moreover, the city's commitment to increased access to parks must be paired with a commitment to adequately fund the park system and ensure efficient use of resources to guarantee quality parks in every neighborhood.

According to our award-winning *Report Card on Parks*, more than 40 percent of neighborhood parks still receive below average grades. We urge the city to consider the following recommendations for making a meaningful commitment to parks a reality:

- Examine access to and capacity of different types of parks, open spaces, and recreational facilities and set targets for growth. (For example, the city of London sets standards for the number of athletic fields for every 1,000 residents.)
- Create incentives for developers to make contributions to park development and maintenance in and around project sites.
- Athletic fields consistently score poorly on *The Report Card*. To address this, the city should create a comprehensive plan for athletic field renovations to ensure that every community has access to a quality field and is equally served by natural green space. In keeping with the sustainability agenda, this plan should thoroughly consider the implications of synthetic turf with respect to global warming, air quality and water pollution. (Synthetic turf fields contribute to the Urban Heat Island effect.)
- Secure an additional \$10 million for the city's forestry team. We applaud the Parks Department's goal of increasing tree canopy

from 24 percent to 30 percent. However, the agency now has only 14 foresters for 2.5 million trees. This investment would greatly improve the state of park trees which are pruned on an emergency basis only resulting in dead and hanging limbs in desperate need of care.)

While planning for the future, keep food at the table

Hilary Baum

Hilary Baum is the Director of the Baum Forum, a not-for-profit organization that works to educate policy makers, food industry professionals, and the general public about a wide variety of food and agricultural issues. In 1995, she co-authored **Public Markets and Community Revitalization**, a publication of Project for Public Spaces and the Urban Land Institute.



While Mayor Bloomberg's concept for a sustainable city is expressed in the context of the exciting and ambitious umbrella effort known as plaNYC 2030, he and his advisors have not included the enormous impact of food systems on the urban environment and our present and future quality of life. The mayor and the Office of Long Term Planning and Sustainability should reconsider this omission.

Some of the nation's cities that have formal sustainability initiatives — as, happily, New York now has — recognize food and agriculture as impacting resource consumption, waste, water and air quality, land use, transportation, public health, community food security and economic development. These cities include San Francisco, Santa Monica, and Oakland in California, and Portland, Oregon (to name a few). San Francisco's Sustainability Plan states, "it is imperative, when planning for sustainability, that all cities consider the production, marketing and distribution of food, as well as the recycling of food wastes, within their boundaries and bioregions."

One of the mayor's collaborators on plaNYC 2030, the New York League of Conservation Voters (Education Fund), has included food and agriculture as a major component in its own report, 2007 Sustainability Agenda for New York City. The league suggests that the city expand its support for more retail farmers' markets and for the proposed wholesale farm-

ers' market for New York City as next steps in advancing the mayor's sustainability goals.

Mayor Bloomberg now needs to embrace food and agriculture as a formal component of his vision for a sustainable city. Now is the time to increase the mayor's 127 separate initiatives to include the following and more:

1. Continued support of the NYC Watershed Agreement that fosters land stewardship and sustainable agricultural practices and that preserves family farming while protecting NYC's drinking water.

2. Support for expanding the production, processing, marketing and distribution of locally produced farm products through more retail farmers' markets throughout the city, a wholesale farmers' market and year-round public markets. Rebuild the Hunts Point Terminal Market as a state of the art, environmentally engineered facility with increased capacity to safely handle and store fresh food with direct links to transportation that will decrease traffic through nearby residential areas.

3. Increase and sustain the ability of city schools to procure and prepare locally produced farm products. Support efforts to establish and maintain gardens in schoolyards and on school roofs.

4. Encourage land use planning that values community gardening and urban agriculture as a means of preserving open space and benefiting public health and well-being.

5. Augment and protect the diversity and distribution of retail outlets, such as bodegas selling fresh local fruits and vegetables. Improve public health through increased access to affordable nutritious food in all neighborhoods.

6. Support measures that enable low income residents, being the most vulnerable to diet-related diseases and food insecurity, to participate in and benefit from a more locally-oriented food system through: expanded access to farmers' markets and community supported agriculture; federal food assistance programs and innovative emergency food programs that link to increased consumption of local food; utilization of EBT at farmers' markets; increased utilization of Senior and WIC/Farmers Market Nutrition Programs; Summer School Meals that feature local, seasonal farm products, etc.; and support measures that encourage and enable low income residents to participate in job and entrepreneurial opportunities in the food and agriculture sector.

7. Develop a city-wide program that recovers and makes use of food waste through composting and other means, linking back to local farms and urban gardens.

8. Develop a procurement policy for city agencies and institutions that encourages purchase of locally-produced farm products for programs and special events.

9. Foster collaboration between the Office of Long Term Planning and Sustainability and the newly created office of the Food Policy Coordinator for New York City, the Food Policy Taskforce (which is composed of New York City agencies), and the New York State Department of Agriculture and Markets.)

Sustainable city needs children that can think green

The Cloud Institute for Sustainability Education

The mission of The Cloud Institute for Sustainability Education is to ensure the viability of sustainable communities by leveraging changes in K-12 school systems to prepare young people for the shift toward a sustainable future.



When Albert Einstein said, “The significant problems we face cannot be solved with the same level of thinking we used to create them in the first place,” I believe he was talking to educators. We think he knew we would have to create new knowledge and understanding, because passing on only what we already know in the same ways in which it was passed on to us will not, and cannot, contribute to the kind of thinking required to make shifts toward a healthy and sustainable future. We believe that Educating for Sustainability (EfS) comes as close as anything to date to satisfying the need that Einstein articulated so well.

Why educate for sustainability? Because we have to learn how to live well in our places without undermining their ability to sustain us over time. The foundations of our knowledge, skills and habits of mind are cultivated in our K-12 schools.

How can Education for Sustainability contribute? How do you educate for the world you want instead of the world you have? To ensure sustainable communities, we will need to create and apply knowledge, employ skills and develop habits of mind that will increase our capacity to make the shift toward sustainability. This requires the development and implementation of transformative learning experiences that create the conditions for people to learn why and how to:

- Think systemically to “solve more than one

problem at a time while minimizing the creation of new problems” (Wendell Berry)

- Think differently and live well within the means of nature
- Think laterally (out of the box) to meet our self-interests by developing mutually beneficial relationships, continuously improving life on our planet for now and for future generations, turning problems into opportunities and creating value all the while
- Think deeply and critically over time about what is important, about what we want to sustain and about taking personal and collective responsibility for our shared future

In 2004, the United Nations declared this the Decade of Education for Sustainable Development. The whole world is participating in the decade. In the United States and several other countries in which it has members, the National Association for Independent Schools (NAIS) has taken a leadership role in bringing EfS to their schools and communities. Public school systems around the world have begun to lead their communities in the charge. In the U.S., cities, towns, and municipalities in Vermont, Oregon, Kentucky, New York, California, New Mexico, Wisconsin, Michigan and New Jersey, to name a few, have begun systemic initiatives in EfS that are congruent with the direction that those places want to go. With the generous help of the Nathan Cummings Foundation and the Bay and Paul Foundations,

many of these places are joining with the Cloud Institute for Sustainability Education in NYC, Peter Senge and the Society for Organizational Learning, and Creative Learning Exchange to develop a national learning community of practice to develop “Schools that Learn in Communities that Learn for a Sustainable Future.”

In New York City, Mayor Bloomberg has launched the plaNYC 2030, a Sustainable NYC Initiative. The Cloud Institute has a partnership with The Mayor’s Office of Long Term Planning to weave Education for Sustainability into the fabric of plaNYC 2030. The Cloud Institute has been working for 12 years with the city Department of Education (DOE) to bring EfS to high school students through two full courses of study we developed for them: “Business and Entrepreneurship for the 21st Century” (BEE 21), a Career and Technical Education (CTE) course, and “Inventing the Future: Leadership and Participation for the 21st Century,” which is designed to meet and exceed the standards for a Participation in Government course. The Surdna Foundation and the Ewing Foundation have helped make it possible for more and more schools to teach these courses. In this way, more students may develop hope, and a sense of place and purpose, so that they too can contribute to the shift toward sustainability in their communities.

Schools Chancellor Joel Klein, the city DOE and School Construction Authority have committed to, and are engaged in, a “Green Schools” initiative in collaboration with the U.S. Green Building Council. Their Green Schools Guide will drive design, construction and operation of sustainable school buildings now and into the future. We have an opportunity to link these green buildings to curriculum and instruction. School Food is making the shift as well with the help of Farm to Table legislation, Edible Schoolyards, Baum Forum, Teacher’s College, Green Markets and Ag Extension, among many others. It is happening.

The future of our city is being created now. Today’s youth will inherit NYC along with its unique 21st Century challenges. Education

for sustainability offers youth the opportunity to create an authentic, hopeful vision for their lives, schools and communities. Further, it involves community stakeholder groups in activities that enhance and strengthen relationships between schools and their communities.

Einstein was well aware that we don’t know what we don’t know. We wonder if he ever imagined that schools and communities would work together over time to keep thinking, innovating, collaborating, talking candidly, improving their capabilities, self-correcting and making personal commitments to a shared future.

We imagine it every day.)

Planning for wildlife is important — especially in cities

Nature Network

Nature Network is a collaboration among organizations dedicated to nurturing a healthy natural environment in the NJ-NY-CT Metropolitan region. Nature Network inspires ecological citizenship by creating and disseminating knowledge and fostering dialogue on critical environmental issues.



Mayor Bloomberg’s plan for 2030 may be the best long-range plan ever written for an American city. However, Nature Network has identified two areas in which there should be ongoing discussion now that the plan has been released.

1. Habitat and Wildlife Protection

There are two references to wildlife habitat in the plan’s section on water capture (page 59) and wetlands (page 126), but they are incidental. Yet there are important natural areas worthy of special protection. New York City has not been protecting several important natural areas within the city despite spending large sums of money restoring nature in other places.

In order to build support for some of the more demanding public policies aimed at curbing climate change, Americans will need to feel a deeper appreciation for nature. This is no less true in a dense city like ours, where natural systems — not just parks and playgrounds, but also unique ecosystems like those found on Jamaica Bay or the Bronx River — are sometimes hidden in plain sight. City dwellers, like all other Americans, need to learn to live with nature rather than continuing to try to overcome it.

Nature Network encourages a strong focus on preserving and improving local wildlife and plant habitat.

2. Waterfront Development

The plan states that, “Today, New York City’s 578-mile waterfront offers one of the City’s greatest opportunities for residential development.” Nature Network would like to discuss the implications of intensive development on the waterfront. Considering the risk of storm surge and with significant sea level rise anticipated as a result of global climate change, serious thought needs to be devoted to an appropriate response. This administration and its successors will need to consider whether to protect the city from the effects of sea level rise and storm surges through engineering techniques or natural means.

* * *

Nature Network has expert members able to talk about these issues and work together towards common goals.)

Local talent, local viewpoints, are vital to land use plan

Tom Angotti

Tom Angotti is Professor of Urban Affairs & Planning and Director of the Center for Community Planning & Development at Hunter College/CUNY.



Mayor Bloomberg's 2030 plan has many good ideas and initiatives, but its fatal flaw is the lack of any significant involvement of neighborhoods and communities. Section 197-a of the New York City Charter establishes a mechanism for developing and approving plans. That mechanism includes public hearings, discussions and votes by community boards, borough presidents, the City Planning Commission and the City Council. The 2030 plan involves none of these forums. It was cooked up in City Hall with the aid of outside consultants. Consultations with community and civic groups were more like managed focus groups where marketing techniques were tested and individuals were never allowed into the decision-making process.

By keeping the 59 community boards and thousands of community-based organizations outside the decision process, many noble goals outlined in the 2030 Plan are likely to run into local opposition. For example, when it comes time to find locations for proposed housing and "public plazas," the city will find itself in territory strangely unfamiliar to its public relations consultants. Even worse, the city has missed an opportunity to mine the rich collection of local talent, experience and planning ideas, many of which are consistent with and even more developed than those coming out of City Hall.

This is unfortunately a long-standing pattern and part of a political culture in the city

that thwarts democratic engagement in planning. There are now more than 70 community-based plans, developed mostly without city help. Only 10 percent of these have gone through the process established in the City Charter and been officially approved. But even this handful of local plans has been virtually ignored by city agencies and the City Planning Department, who maintain that the plans are "only" advisory.

The 2030 plan could be a much-needed framework for community-based planning, which should not be divorced from city-wide needs and policy considerations. But the 2030 plan promises a continuing top-down approach. If it were to go through the Charter-mandated process, it would invariably come out a much richer plan with much better prospects for implementation. Skeptics will scoff at the idea of review by all 59 community boards, pointing to their shortcomings and instances in which the board membership fails to truly reflect community residents. But this would be a good opportunity to strengthen the boards as foundations of local democracy, provide them the resources needed to fulfill their mission and insist that they be inclusive and representative of their constituencies. If they become partners in formulating the city's long-term goals, the city will have a much better chance of achieving those goals.)

Housing preservation as important as new construction

Association for Neighborhood and Housing Development

The Association for Neighborhood and Housing Development is a membership organization of New York City non-profit neighborhood housing groups. Its mission is to ensure flourishing neighborhoods and decent, affordable housing for all New Yorkers.



The Mayor's 2030 Plan lays out 127 bold and detailed proposals for updating the city's aging infrastructure, moving toward more sustainable energy provision and turning back the effects of global warming. While we applaud the mayor for undertaking this important initiative, it falls short in a critical area: affordable housing. The mayor's plan for creating an additional 265,000 housing units focuses mainly on making more land available for development. This strategy alone is both incomplete and troubling as it will not increase the pool of affordable homes nor guarantee that safe, decent housing remains within reach for low- and middle-income residents over the long-term.

A truly comprehensive plan for solving the city's housing crisis would commit to:

- Ensuring the permanent affordability of all units built with city and state financing;
- Incorporating affordability terms into any rezoning or land use decision; and
- Embracing an asset-management-based approach for preserving our existing affordable homes.

Specifically, in terms of preservation, the city must come to see itself as a steward who is dedicated to maintaining and improving housing quality through effective code enforcement, protecting rent-regulated stock through repeal of High Rent Vacancy Decontrol and ensuring that not another unit of Mitchell-Lama or HUD-assisted housing is lost by providing

more incentives for owners to keep their properties affordable.

The Mayor's Plan for Housing

To accommodate the almost 1 million additional New Yorkers expected by 2030, the mayor intends to increase the supply of vacant and under-built land available for housing development. Increasing the supply will be accomplished through:

1. Large private applications (26,400 to 28,300 units);
2. Publicly-initiated rezonings (54,000 to 80,400 units);
3. Creating new housing on public land (29,400 to 42,000 units);
3. Exploring additional areas of opportunity such as decking over rail yards (208,600 to 346,600 units)

These strategies are expected to expand the supply potential by almost 500,000 units, which would help reduce the gap between zoned capacity and built units that has driven prices upward. As the portfolio of city-owned land is virtually gone, undertaking a comprehensive survey of prospective buildable lots is a worthy endeavor. Other positive aspects of this approach are its focus on identifying land that has access to public transportation or is in need of environmental remediation, along with its recognition that development must preserve a neighborhood's character and respond to the needs of current residents.

The mayor believes that by decreasing the “scarcity premium” developers now pay for limited buildable sites, the overall price of housing will fall enough to ease the affordability crisis. Demand will always overwhelm supply in New York City, however, so prices are unlikely to fall substantially regardless of how many units are added. In addition, this strategy fails to account for certain factors that have limited available land in the past, including local opposition to upzonings, the reluctance of public agencies to turn over valuable real estate and the incredible capital costs that will come with decking and environmental remediation. Also, without targeted subsidies and a strong rent regulation system, there is no assurance that additional units will be affordable to low- and middle-income New Yorkers. Moreover, while many of the 127 initiatives have new revenue streams attached, no new financial resources have been targeted for housing.

The fundamental problem with this approach, however, is that it ignores the fact that every year we lose affordable units by the thousands. Between 2002 and 2005, the city lost roughly 260,000 affordable units or more than 85,000 a year. To put this in perspective, it is more than 2-1/2 times greater than the 31,599 building permits, the highest number ever, the city issued in 2005. The lost units were in the following categories:

- More than 205,000 that were affordable to households earning 80 percent of Area Median Income (\$50,000 for a family of four) due to rising rents and stagnant incomes
- More than 44,000 units of rent-regulated housing; and
- Almost 10,000 units of Mitchell-Lama and project-based Section 8 housing

If these losses continue, additional units will be little more than a drop in the bucket. While expanded production is instrumental in ensuring that enough housing is available, the city cannot solely hope to build its way out of the crisis. Rather, the city must produce housing that is permanently affordable when public land, subsidy or other incentives are used. It

also must preserve what we have through effective code enforcement, strengthening rent regulations and protecting Mitchell-Lama and HUD-assisted properties.

How We Can Solve the Affordability Crisis

In his speech the mayor said, “Long-term investments do not make for good politics, but do make for good cities.” We could not agree more. During our conversations with the Mayor’s Office of Long Term Planning and Sustainability and HPD around plaNYC, we repeatedly expressed our belief that any use of public land, subsidy or other incentives must meet a high standard of public benefit: permanent affordability. Unfortunately, the mayor’s own housing plan, the New Housing Marketplace Plan, fails to make this long-term investment.

New Housing Marketplace Plan

While the mayor’s New Housing Marketplace Plan is an unprecedented investment to create or preserve 165,000 units, it falls short of meeting the city’s enduring housing needs. A recent article in The New York Times raised this very concern and questioned whether the New Housing Marketplace Plan would produce a net increase or merely replenish a depleted stock of low-cost homes. In fact, it may not even meet this lesser objective as owners of the first projects created under the mayor’s plan will have the opportunity to pre-pay their mortgages and bring the units to market long before 2030.

Although the expiring-use crisis that now plagues both Mitchell-Lama and HUD-assisted stock is widely documented, the New Housing Marketplace Plan fails to avert a similar crisis by not establishing long-term affordability restrictions. As more and more working-class New Yorkers pay more than 30 percent of their income for housing or are forced to leave the city altogether, it seems logical for the city to shift to a policy that provides incentives for creation of low- and moderate-income housing and that requires that it remain affordable permanently. This approach is both an efficient use of taxpayer dollars and an essential step toward preserving the economic diversity of the city.

Inclusionary Zoning & Other Land Use Policy

The city's pledge to expand the use of Inclusionary Zoning, which allows for larger buildings if developers include affordable units, was another promising aspect of the mayor's plan. Inclusionary Zoning has been used successfully in Brooklyn, Manhattan and Queens and could lead to the production of more than 6,000 new affordable units. Expanded use of this strategy is especially welcome because the non-market rate units are permanently affordable.

The city must also institute a land use policy that does not disqualify current residents by pricing them out of new units. For example, 60 percent of Queens residents will not be able to afford any of the 5,000 new apartments being built as part of the Queens West project, despite a \$150 million contribution from the city. The city's practice of promoting gentrification, as it is doing with Queens West, must be stopped.

The Importance of Stewardship

The significance of preserving every unit of the city's affordable housing is particularly evident when considering who currently occupies it and what is being built to replace it.

First, a large percentage of the city's affordable housing stock is occupied by senior citizens. According to the Department of City Planning, New York will be a much older city in 2030. In fact, more than one-third of the city's 1 million new residents will be elderly, which will put an even greater strain on the shrinking pool of low-cost apartments.

Second, most of the housing development across the city is not being built for poor families or seniors on fixed incomes, even though millions of public dollars are used. Thus, it is especially critical that we do not lose another affordable unit due to physical maintenance, High Rent Vacancy Decontrol or opt-outs and fail-outs.

Physical Maintenance

Overall, the physical condition of New York City's housing stock is improving. The city should be recognized for its efforts to improve housing quality through both the Targeted Cyclical Enforcement Program (T-CEP) and

the recent Safe Housing Act. However, housing quality remains a persistent and alarming problem in the city's poorest neighborhoods. According to the most recent census survey, more than 75,000 apartments were severely distressed, with five or more hazardous maintenance violations. For tenants, housing maintenance and repair issues can make daily living dangerous and are often related to displacement of low-income people.

New York City tenants lodge almost 600,000 complaints about maintenance conditions in their apartments each year, but there remain 2.8 million open maintenance violations known to the city Department of Housing Preservation and Development. This is largely because the city is unable to follow-up by assessing penalties if landlords do not repair apartments. Other major cities use a "Repair Enforcement Board" model that achieves a much higher rate of compliance. ANHD believes a similar model should be adopted here and is working with the state and city to make this happen.

Protect Rent Regulated Stock

Each year, more than 14,000 apartments lose their affordability when they are removed from Rent Stabilization or Rent Control. Ten thousand of these are lost because of "High Rent Vacancy Decontrol." Passed in 1997, but only widely used in recent years, High Rent Vacancy Decontrol allows landlords to permanently remove a vacant apartment from rent regulation if it has a legal regulated rent of \$2,000 or more per month. Increasingly, landlords are using whatever tools they can to remove tenants from apartments renting for less than \$2,000, then raising the legal regulated rent to the \$2,000 threshold by using the loophole of making "improvements" in the apartment and passing along the cost to tenants.

Two of the main tools used by landlords to remove tenants are frivolous evictions and tenant harassment. It has been reported widely that the Pinnacle Group issued eviction notices to residents in 25 percent of its 20,000 units. In fact, citywide evictions were up by nearly

8 percent in 2006. Tenants also have reported more sophisticated forms of harassment, such as overly aggressive legal cases not backed up by facts, fraudulent legal notices, threats based on immigration status, repeated pressure to accept a buy-out and denial of essential services.

ANHD is working with the City Council and HPD on legislation that would allow tenants, for the first time, to sue landlords for harassment in housing court. We also urge the mayor to use his influence in Albany to persuade the Governor and legislature to repeal High Rent Vacancy Decontrol before the rent-regulated stock is decimated. This would not cost the city anything but would go a long way toward protecting the homes of thousands of New Yorkers.

Mitchell-Lama and Project-based Section 8

In New York City, there are 114,000 Mitchell-Lama units and 77,000 HUD-assisted apartments. These properties, which are located in every borough, often anchor entire neighborhoods and provide security for tenants who otherwise would be pushed out due to gentrification. Mitchell-Lama and Project-based Section 8 properties house people with very low incomes. In fact, the median household incomes are about \$22,500 and \$11,500 respectively. Also, roughly 40 percent of units are occupied by seniors and people living with disabilities who would have few alternative housing options if displaced. Unfortunately, many of these properties are now at risk due to market pressures that drive owners to not renew their subsidy contracts, fiscal mismanagement or physical neglect.

As mentioned above, losses for both Mitchell-Lama and Project-based Section 8 properties have accelerated recently due to the city's super-heated housing market. While political opposition to the sale of Starrett City has been encouraging, more than 1,000 other Mitchell-Lama apartments left the program since the proposed sale was announced. These losses significantly undermine the city's efforts to build and preserve affordable housing under the New Housing Marketplace Plan. Unfortunately, no

new efforts were announced to preserve these assets.

We believe that the city must begin to see itself as a steward charged with protecting every unit of affordable housing. We urge the mayor to create an entity whose primary focus is asset management rather than production or compliance. This entity would work with tenants, monitor at-risk properties and provide incentives for landlords to stay in these programs.

Community Planning

We believe the time is right for the city to abandon its piecemeal rezonings and undertake a comprehensive, community-based planning initiative to ensure that its zoning policies promote growth that is smart, equitable and strategic. Building on its outstanding outreach during the planning stages, we encourage the mayor's office to institutionalize a transparent and comprehensive process going forward by regularly inviting input from local residents and community groups. To make certain that residents can participate actively, the city should also provide resources and training.

Going Forward

Twenty-five years ago, New York City symbolized urban decay. Today the city is thriving economically, culturally and socially. We congratulate the mayor and his staff for their bold plan, and we believe the plaNYC initiative is a great first step toward building a greener, greater New York. While the mayor should be applauded for his vision, as advocates we must work to ensure his plan preserves the economic, racial and cultural diversity of the city.

The mayor closed his remarks by urging New Yorkers to think big, swing for the fences and work with him to create a 21st Century city. As we demonstrated throughout the planning process, the affordable housing community is eager to serve as a partner in that endeavor. However, we also present a challenge to the mayor: as New York City becomes a model for sustainable, green living, it also must serve as a pioneer in providing safe, decent housing that is permanently affordable. We are optimistic that history will remember this administration as one that met this challenge.)

Public Advocate Betsy Gotbaum thanks all of the contributors for generously offering their time and insight.

The mayor sought input from a variety of stakeholders in drafting **PlaNYC: A Greener, Greater New York**. The Public Advocate will work to ensure that those stakeholders — and many more — continue to be heard as the city works to make itself more sustainable. Dialogue should not end with the publication of a plan. The preceding twelve articles make it clear that advocates and experts have a vital role to play in putting PlaNYC into practice.

As part of her commitment to maintaining an open dialogue, the Public Advocate is working to convene a citywide conference on the plan's ongoing improvement and implementation. The conference, which will take place in the fall, will bring together community leaders, advocates, and experts with an interest in planning for a sustainable city. Leading up to the conference, the Public Advocate will engage in conversations with community boards, civic associations, and business and community leaders to ensure that their opinions are part of the public conversation concerning the plan.