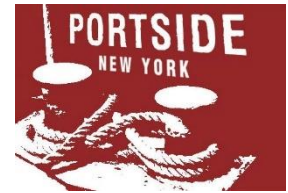


June 11, 2021

PortSide New York
comments on Draft CWP

Via email to waterfrontplan@planning.nyc.gov



For future reference, PortSide New York waterfront advocacy positions are on the webpage at <https://portsidenewyork.org/advocacy-1>

The award-winning, maritime nonprofit PortSide New York finds much to celebrate in the values and goals embedded in the draft Comprehensive Waterfront Plan (CWP). Thank you for the thoughtfulness of the draft CWP and its stress on the values of climate justice and racial equity, on serving and listening to vulnerable and historically marginalized populations, and on partnering with those communities. The CWP focus on equity and inclusion reflects the values with which PortSide was founded in 2005.

However, PortSide feels compelled to express strong concerns about governance. We feel compelled to stress that there needs to be a significant overhaul of the public sector management MO for the goals and spirit of the draft CWP to be attained. You don't pour good wine (or your favorite beverage) into a broken glass, and the current management and governance system is that broken glass which explains why there has been little change resulting from Vision 2020. We feel compelled in this statement to provide examples of how the system is broken and not just propose solutions in the usual way. Real systemic change is needed. Ten years after Vision 2020, NYC remains a boat-unfriendly city and is known as such along the eastern seaboard.

There is massive change coming to the political system given the number of elected officials being replaced due to term limits. After elections, DCP needs to conduct another wave of outreach meetings to educate all the new office holders about the CWP and the waterfront itself so this CWP is not just an aspirational list of values and goals.

PortSide New York credentials

To explain PortSide's point of view and knowledge base, we were founded to change city waterfront revitalization policy so that it made greater use of the waterways, meaning maritime activity of every kind: waterborne freight, passenger ferries, commercial vessels of the charter, excursion, and dinner boat type; historic and educational vessels; and recreational boating of every size. PortSide planned to do this primarily via the inspiration of our innovative maritime center that would show how to combine working waterfront and public access and show, through diverse programs and services, how to use maritime for community and economic development. 16 years after being founded, we still do not have the space to create that maritime center. For 16 years, we have battled the public sector impediments to maritime activity we were founded to change. That means we know what we are talking about when we say NYC is not friendly to maritime. Our comments here are informed by our mission and our real estate saga. Over the years, PortSide's mission grew to include inspiring more educational use of the harbor (a key part of NYC heritage and present that the DOE mostly ignores); and due to Sandy, resiliency focused on flood preparedness for residents and businesses.

Real solutions needed not just virtue signaling

The current CWP, as opposed to the last one Vision 2020, needs to ensure real action not just “make pretend” solutions such as the “Historic Ship Docking Protocol” created by the NYC EDC so they could check off one of their To Do items in Vision 2020. The EDC based it on the ship-unfriendly Hudson River Park berth permit, conferred with other parks, and did not talk to the ship people. PortSide showed that protocol to a principal at a major admiralty firm who deemed it “ridiculous.” Those of us managing historic ships knew that it was not any solution to our woes.

Similarly, the Waterfront Management Advisory Board is cited by this draft CWP as some kind of asset, but PortSide and others have found that it was impossible to join, that its managers in the Mayor’s office never responded to queries, and that it seemed to be a dead letter as an entity; but since it had no website until recently, hard to say what it was doing, if anything.

Challenges to change

Advocates with institutional memory have quit: One challenge to changing the system is that many harbor advocates involved in the process for Vision 2020 are dispirited and have left the advocacy field. Preparing to write this document, we phoned around the harbor to see how various entities (industrial, historic, commercial and nonprofit, large and small scale maritime) were planning to contribute to the CWP this year. We found that all agreed with PortSide that Vision 2020 had led to little real change. Many said they had given up, that they were so disheartened by the lack of progress they would not make the effort of contributing to this CWP. Bear that in mind as you tot up the comments submitted over the process that created the draft CWP and the comments you receive to the draft.

Public sector management incompetent and not listening: PortSide devoted much time to contributing to Vision 2020 and were inspired by the final plan. However, little of the Vision 2020’s greatness was put into effect. Though hurricane Sandy can be blamed for shifting the focus from that plan’s embrace of the waterways to protection from water (recovery and resiliency), a major cause of Vision 2020 falling flat was ossified, unresponsive and even incompetent management — the broken glass again. We have written a lengthy attachment about the NYC EDC as their performance is so disappointing and so far reaching in waterfront matters.

So many public sector waterfront bureaucracies: A challenge for changing this management culture is that NYC’s public sector waterfront is managed by many entities, especially due to the decision to have many of the new major waterfront parks be run by their own authorities rather than the Parks Department (notably Hudson River Park, Brooklyn Bridge Park, and Governors Island.) There are also waterfront parks run by the NYC Parks Department, New York State, and the federal government. There are EDC locations, and then there is the potential for water-access points at the DOT street ends leading to the water. The EDC is NOT part of NYC government and does not offer transparency and accountability, and the City Council does not

approve their website, making the EDC resistant to input. It needs reform; we hope the new Mayor takes this on, and hope our appendix about the EDC provides targets for what to improve.

Negative impacts of the broken system

Boats have left. Boats have been scrapped. NYC's only town dock at Pier 25 Hudson River Park was removed. The Friction in the system and lack of funding means local historic vessels have stopped trying to move around NYC to do mobile programming. Nonprofit budgets suffer due to time spent on intrusive, obstructive red tape, lack of space, inability to have revenue producing activities. All sectors of maritime are straining to go but stunted by lack of space and Kafkaesque RFPs and permits.

Apart from the kayaking sector which made significant inroads since Vision 2020, most maritime uses have found little progress in making NYC more boat friendly. Piers have been built for pedestrians, piers for ships have been badly designed and built for them, long-term and visiting vessel berths remain few and hard to get. Even if you can get your ship to a pier, the permitting and management over-control on site is stifling and the whole process is grindingly slow.

The glory and purpose of boats is to move between locations, but the only consistency between the locations above a prevalence of boat-unfriendly designs and rules. The best most boats can do is leave their homeport and return there as it is too hard to access another pier for a visit.

There is also a lack of funding to support educational ship visits, so boats can't behave like boats and move around NYC from place to place. The high cost of tackling the friction in the system with no funding support has stopped NYC vessels moving around the city to offer visiting vessel programming at the dock and prevented many visiting vessels from getting here or even trying.

PortSide is regularly contacted to help out-of-town vessels find a berth to visit, even by organizations as well-known and powerful as Greenpeace, all of them stunned by how hard it is in NYC.

Even worse than no funding support is competition from the parks themselves: we know of instances where a major park sought funding support for visiting vessels from the same corporate sponsors approached by a nonprofit, leaving the nonprofit to program for free with no funding while the big park captured the funds but didn't share it with the organization bringing the boat and programs.

Elements of the CWP, such as creating a real FreightNYC plan or getting e-commerce to move some of its freight by water, or crafting effective resiliency plans are only going to happen with a different management culture, possibly by changing the management outright.

PortSide's experience with the NYC EDC as our on-again, off-again landlord, plus our research around the harbor, has convinced us that the EDC is not capable of handling such endeavors or of flexing to change. We have many reasons to say this and thus include Appendix EDC about them. The EDC has a high track record of failure and are deeply resistant to input (even when

presented helpfully and constructively, and even if the suggestions call for simple changes), and they do not offer transparency and accountability.

The EDC is the NYCHA of economic development: it fails to do the work, offers no responsiveness, transparency or accountability, but has more money for glossy PR than NYCHA.

The fact that the EDC is NOT a government agency, it is an independent nonprofit doing business for the city, means that there are no mechanisms to guarantee transparency and accountability nor to control their budget as a way to influence their behavior. However, since Vision 2020, the EDC's waterfront work has expanded to include resiliency planning and construction, operation of the NYC Ferry, and the creation of DockNYC whose portfolio of berthing sites continues to grow. More in Appendix EDC

Park Equity and Housing as a CWP theme

Much of the draft CWP talks about introducing housing along the waterfront and also talks about park equity, e.g., providing parks in low-income communities and communities of color.

Our concern here is that rezonings, waterfront park planning, and private real estate development during the past 20 years in NYC have meant that housing added to the waterfront is luxury housing, that the building of parks depends on the addition of luxury housing (and sometimes shopping and hotel uses), all of that meaning that new waterfront parks displace the residents (gentrification). Simply put, this means a new waterfront park is for new people. That pattern does NOT achieve park equity, so new models for development and new city priorities need to be developed if new waterfront housing does not continue to mean displacement of residents/gentrification.

PortSide believes there is great potential for waterfront access to be achieved outside of parks, without rezoning, on the working waterfront for special events. PortSide has done many of them between the Red Hook Container Terminal and the Brooklyn Navy Yard. We see the Atlantic Salt terminal on Staten Island is an inspiring model of how to do this; and for ongoing access, the Newtown Creek Wastewater Treatment Plant is a stellar example of how to combine heavy industrial uses, access, art, education, interpretation, and high design. Access to working waterfront sites also supports goal 5 under Working Waterfront in the draft CWP. We love it so much we copy it in its entirety below:

Goal 5. Expand opportunities to connect New Yorkers to their working waterfront.

5.1 Increase maritime literacy through public signage, art, educational facilities, and tours.

a. In partnership with the maritime community, including maritime-oriented educational institutions and nonprofits, create a campaign to educate New Yorkers about the importance of the port and working waterfront.

We cite some positive signs of change

Growth of kayaking

We are heartened by the Governors Island equity pivot summer 2020 with its focus on NYCHA residents and communities impacted by covid, and finally providing direct ferry service to and from Red Hook.

Pier 25 in HRPT will soon have all berths filled with historic ships for the time since the pier opened where design flaws and high-friction HRPT management drove boats away

It is a huge evolution and embrace of the waterways to see the draft CWP speak so supportively of swimming.

Solutions proposed by PortSide NewYork:

1. **Finally provide a right-sized, long-term home to PortSide NewYork** (one with less limitations than we presently endure and long-term security so we can finally grow) so that we can create the inspiration of an innovative maritime center.

Given that NYC's first maritime middle school is being built by the DOE a few blocks inland of our current location, it is even more imperative that PortSide have building space, and more than the 6,500 sq ft the EDC promised us in 2008 into 2011. Only with a right-sized PortSide with long-term site stability can we serve that new school.

With space to grow we can help fulfill many objectives of the draft CWP given the multi-service nature of our work and because we fulfill the spirit of the draft in terms of equity and inclusivity. Before these terms were such common currency, PortSide was created with those values in mind. See programs such as our [African American Maritime Heritage program](#), events like our Puerto Rican Red Hook WaterStories day, and our virtual museum [Red Hook WaterStories](#) launched in 2016 where "inclusion is a theme in this e-museum that memorializes forgotten, overlooked and erased histories."

PortSide's work speaks strongly to the following in the draft CWP:

- Waterfront Public access goals 1, 3, 4: *Expand public access to the waterfront, promote stewardship of the public spaces on the waterfront, promote opportunities to get onto and into the water*
- Economic Opportunity Goals 2, 4: *Connect the City's economic development investments on the waterfront to employment and career advancement opportunities; promote commercial boating to expand recreational and educational opportunities and help stimulate the city's economy* (historic and educational ships are in there)
- Working Waterfront Goal 5: *expand opportunities to connect New Yorkers to their working waterfront.*

PortSide requests the following in Atlantic Basin, Red Hook:

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- 12,000 square feet at the south end of the Pier 11 warehouse and shared use of the adjoining loading dock with a 20-year lease.
- Use of the parking lot south of that space, with the approval of Ports America which uses it when cruise ships are at the Brooklyn Cruise Terminal.
- Permission to have revenue-generating activities (all are currently blocked) including vessels alongside our flagship MARY A. WHALEN that pay PortSide fees, retail (such as a museum store and café). There may be others.
- Demand that the Port Authority of NY & NJ lift their fees on photo, TV and film shoots that make the MARY A. WHALEN too expensive for shoots to use, effectively blocking that potential revenue stream (and stifling the local film and photo industry).
- Relief from the requirement that PortSide submit permits for every event with over 20 people. Our lease (currently a berthing permit for the ship) should allow us to conduct normal operations without suffocating interventions like this.
- Space in the Pier 11 warehouse, before we get the 12,000 sq ft above, to get the vintage engine we acquired from a Missouri powerplant out of the weather.

We note that the EDC promised us a home in Atlantic Basin 2008, 13 years ago, so to ask for a 20-year lease now compensates us for 13 years run on the clock and adds just 7 more years. We are not asking for the 600' of pier that was promised back in the day due to the intense berthing use in that space now and plans for NYC Ferry Homeport 2 there.

We are asking for more building space in the Pier 11 warehouse than originally promised as the former allocation of around 6,500 sq ft was not sufficient. There is space available; the whole warehouse is largely empty at this time. Even though it is largely empty, the EDC rented the section previously promised to us, after we did another business plan for it in 2018 at the EDC request (see www.bitly/ASHORE2). The EDC rented that space to the Formula E car race which occurs only 2 days a year (and was cancelled in 2020 due to Covid). Compare to PortSide uses which would be year-round and serving the low-income communities that the draft CWP says should benefit from this plan.

During the depths of the pandemic, PortSide could have used the large, high-ceiling warehouse portion of that space for popup services to the Red Hook community. It would have made a great, socially-distanced food pantry or emergency laundromat (two pandemic projects in Red Hook) as well as a place for other mutual aid storage and dispatch and socially distanced community meetings and school classes. Compare to our interior ship spaces are too small to even-socially distance our own staff.

We propose that the Formula E storage use be moved north into the warehouse, and that the year-round PortSide use be put at the south end closer to and more visible to the neighborhood we serve.

2. **Create better political representation for the harbor/BLUEspace/Sixth Borough.**

PortSide proposes that a new City Council position be created to represent the waterways and also a Harbor Community Board.

Waterways and maritime users are underrepresented in NYC's political system; no one political entity has more than a sliver of our vast waterfront, so councilmembers have little incentive to push for maritime uses and councilmembers often lack the expertise to do it well since their constituency does not have much maritime. However, large industrial maritime businesses serve the whole city and/or region but are represented by a NYC Councilmember for a small area, not someone with the power to speak for the whole archipelago. Other maritime users (non-profit and for-profit) have boats that want to move around this harbor, and they have to negotiate with sites in many community boards and council districts while lacking the strong advocate of a rep for all of the BLUEspace.

3. **Study boat-friendly port cities and towns close by** to see how they do it. Some examples are Long Island, New England, Baltimore, Norfolk. The local trend in studying the Dutch for inspiration is limited by the fact that their insurance, regulatory and political systems are so different. There IS inspiration close to home.

Tap the knowledge of captains and companies in this port who have operated in other ports so they can offer compare-and-contrast analysis of here and there. For the same reasons, contact organizations such as Tall Ships America and national organizations representing the working waterfront. Use that information to inform the following recommendations.

4. **Find the means to encourage or mandate maritime uses** of the waterfront the way means were found to increase "public access to the waterfront" which just means getting close to the water, not using it. We note that Baltimore instituted maritime protection zoning back in 2004.
5. **A Department of the Waterfront** has been recommended, and PortSide supports this only if it has power to influence waterfront design and permitting around the harbor. If not, it could add just another layer of bureaucracy to a cake that already has too many layers.
6. **Put maritime experts in decision-making positions** at the entities managing NYC owned or managed waterfront sites.

7. Make the various bureaucracies planning, building, and managing NYC's waterfront be more responsive to input from the communities they serve and from maritime voices.

The current CWP often invokes community partnership with government agencies or stewardship by community organizations, but many communities engaged in waterfront affairs find that the authorities running waterfront parks, the multiple government actors, and the NYC EDC are not responsive to input. Many constructive suggestions have been made by local nonprofits (including PortSide) and engaged citizens on all of this since the late 1990s to little effect. For inspiration see, a white paper PortSide co-authored called [Waterfront Community Stewardship Zones Proposal](#).

8. Establish a ship-friendly design standard for piers.

- a. Totally change pier fence design culture so that removable fence sections are used to allow ship gangways to reach the pier instead of gates. The gate position often does not correspond to the anatomy of the ship, and the gates are too narrow as ships move forward and back due to tides, wind and wakes.
- b. Ensure that gangways are allowed to touch the pier! Hudson River Park designed their historic ship pier, Pier 25 prohibiting gangways to touch the pier. This obliged the historic ships to build costly cantilevered platforms which means the pier is not suited for multiple vessels since the platforms are custom-built to the vessels that built them and are protrusions that impede other vessels using the pier.
- a. Right-size the fenders. Size does matter. There are large Yokohama fenders installed on piers intended for smaller boats than that fender size. In one example, Hudson River Park Pier 25 installed Yokohamas scaled to ships hundreds of feet long, longer than the standard gangways of local historic ships can span. This keeps boats away.

For example, when HRPT invited PortSide to visit that pier circa 2011, and we said our gangway would not span those Yokohamas, would HRPT fund our visit to cover the cost of gangway rental and more? HRPT said no. The invitation was to come offer free programs at a higher cost to us due to their bad pier design. We hear that the HRPT claims that there is no historic ship market, meaning they don't have to build the additional historic ship piers in their mandate. The answer is that their approach deters historic ships from coming there to the point that few contact them, not that there is no need for piers.

- b. Oblige the park management to complete the shorepower and water connections on a pier dedicated to historic ships and visiting vessels. On that same pier 25, Hudson River Park obliged the historic ships that won the first RFP there to complete those connections and carry levels of insurance that made these installations very expensive. Build the pier for the tenants, don't oblige the nonprofit tenants to complete the pier. (for more on these see attachment "[PortSide NewYork issues with design Pier 25 HRPT.pdf](#)")

9. **Add town docks.** There should be at least one in every borough. Given the length of our waterfront, there surely should be more than one per borough; but we have not done a shoreline study to propose more specific numbers and locations.

PortSide responds to the draft CWP section by section below. We do not comment on topics that are far from our mission area for example development of housing or water quality.

Resiliency:

First, here are our credentials: PortSide has significant experience in this area from our own Sandy preparations to Sandy recovery and resiliency work. PortSide won a White House ‘Champions of Change’ award in 2013 for protecting our historic ship MARY A. WHALEN from damage and from damaging the property of others if she broke free and for our Sandy recovery work. PortSide ran a physical Sandy aid station for a month after the storm, then a virtual aid station and Red Hook Sandy survivor meetings after that. PortSide continued resiliency work as an appointed member of the NYS NY Rising Red Hook committee which became Resilient Red Hook where we are on-again, off-again members and frequent collaborators. PortSide inspired the [FEMA High Water Mark](#) program which was adopted by NYC Emergency Management. Since Sandy, we created multiple resiliency programs and events. PortSide created an in-depth flood preparation guide for Red Hook in our virtual museum at <https://redhookwaterstories.org/tours/show/9>.

We are concerned that current NYC resiliency plans stress flood protection in the form of coastal walls, berms and land elevations, all of which impede potential maritime uses in conflict with the goals of Vision 2020 and this draft CWP. NYC should not let Sandy to drown the great goal of embracing use of the waterways.

1. **NYC should consider surge-powered barriers** created by the Dutch, masters of flood management for centuries. Here are several links from the Dutch town of Spakenburg, one similar to our home neighborhood of Red Hook, Brooklyn for being a low-rise historic area with an active maritime waterfront. The surge-powered barriers only come up during the storm and allow them to maintain visual and physical connectivity to the waterfront and active maritime uses.
 - Spakenburg summary <http://www.aggeres.com/case-studies/port-spakenburg-the-netherlands/>
 - Spakenburg aerial <https://youtu.be/OFglSBzgVyI>
 - Spakenburg Project movie 2016 <https://youtu.be/ZXKhh00iJfU>
 - Aggeres Flood Solutions: Test Facility <https://youtu.be/PNLoDuJh8lo>
 - Installation SCFB Spakenburg 2016 <https://youtu.be/AXoKv5dkRJM>

2. Comments on specific resiliency plans (Red Hook, Hunts Point, Lower East Side)

- Red Hook: January 2014, Joe Biden (Vice President at the time) and Governor Cuomo announced that the NYS and NYC would create a \$200 million "first in the nation" flood management system for our home neighborhood Red Hook as part of "Reimagining New York for a New Reality." In early 2015, it was revealed that only \$100MM was available for the Red Hook "IFPS" (Integrated Flood Protection System) being planned by the NYC EDC. The Red Hook community resents this \$100MM loss. Though by 2021, some Hesco barriers are now in place, Red Hook feels that they have not received flood protection of any quality that constitutes "first in the nation." The installation is not even complete, and little info has been provided by the NYC EDC over the trajectory of this project. The statement about resiliency planning on page 15 "*An ongoing partnership between agencies and communities helps to ensure that community priorities and concerns are addressed*" would trigger laughter and rage in Red Hook. The DDC assumed control of the project shortly before the pandemic, and Red Hook has received no updates since to our knowledge. Red Hook deserves better.

We conclude by noting that PortSide is located on the flood side of the proposed storm protection; none of Atlantic Basin is protected territory.

- Hunts Point: PortSide is concerned by the slow progress on resiliency plans for Hunts Point where the bulk of NYC's perishable food supply arrives. Had Sandy struck at the time of high tide at Hunts Point, the market would have been devastated. The EDC is both the manager of the market and the entity tasked with planning much of NYC's resiliency planning, and we see their performance at Hunts Point as endangering the city's food supply.
 - Lower East Side: We note that the EDC's resiliency plans for the Lower East Side (Lower Manhattan Coastal Resiliency or LMCR) have received vociferous disapproval from the local community which accused the EDC of a lack of transparency and responsiveness. We wonder if the surge-powered storm barriers we mention above could protect that area without the complete devastation of the park implied by the EDC plan, a devastation that is a major cause of the community resistance to the LMCR.
3. **Goal 4.2 on page 16** says "*incorporate natural and nature-based features into coastal protection projects, where feasible and practicable.*" We propose you add "and maritime activities."

Waterfront public access

As stated above, find ways to encourage or mandate maritime use of waterfront properties not just public access to the waterfront.

Goal 1.3. c. In addition to visual and physical access, provide interpretation of working waterfront at the site and info on workforce info at the location so that the interpretation helps the community understand what jobs could be available so they can prepare for them.

1.4. b. says “*use landscaping and planting to signify routes that get down to the water.*” Landscaping is NOT a universal indicator of the way to the water; signs are. Plants are nice; but you need signs and to improve the signage program. For example, NYC DOT signs were installed in Red Hook to signal the arrival of the new NYC Ferry. The signs do NOT say NYC Ferry. The signs have no text at all. The boat shape does not look like the NYC ferries. In a maritime neighborhood such as Red Hook, the arrival of this stylized boat graphic does not convey NYC Ferry. PortSide posted a photo to Facebook of the sign at Pioneer and Richards Street sign asking if people knew what it meant (generally, no) and it was mocked for looking like an amphibious bus. These signs are also “make pretend” solutions.



Economic Opportunity

Maritime should be mentioned more in this section.

Goal 2.1.e. says “*train young adults aged 18-24 who reside in NYCHA buildings in environmental stewardship, building green infrastructure, urban farming, and resident education through the AmeriCorps Green City Force program.*” Many NYCHA developments are on the waterfront, why are maritime and waterfront jobs not mentioned in this section? In the case of Red Hook, the neighborhood with the second largest NYCHA development in NYC, this is a maritime neighborhood AND there is a maritime middle school being built here. Add maritime in this section. PortSide is eager to help with this goal.

Goal 4.1.a calls for berthing locations for larger vessels (not hand-powered boats). Those locations should also provide shoreside support space. Large vessels use large amounts of supplies in large containers and need space to store things such as 5-gallon cans of paint, extra supplies, and space to conduct maintenance of parts that can be removed from the ship (spars, hatches, seating, lifeboats, etc), a space to work out of the weather. For example, the vessels on our Pier 11, Atlantic Basin could use and share one bay of the warehouse. The EDC is not providing any shoreside space with the berthing permits. This shows ignorance of the real operational needs of ships this size.

Working Waterfront

Goal 1.3.b. The proposed Maritime Building Code should also be applied to parks. Management at Governors Island, Hudson River Park and Brooklyn Bridge Park have consistently failed to properly design piers for boats. The EDC has also failed. Do not assign the creation of this code to the EDC.

Goal 4.1 promotes barges as a way to move cargo within the city. PortSide proposes that high-speed freight ferries also be considered since tugs and barges are slower than such ferries, and time-sensitive cargo such as e-commerce cargo and perishable foods from the Hunts Point market would be better moved by fast ferries than barges.

Goal 5 “*Expand opportunities to connect New Yorkers to their working waterfront*” could not be more suited to core PortSide programs, however the EDC has consistently blocked ways to do this from denying us space to denying PortSide have a sign on the NYC Ferry dock that mentions our virtual guide www.redhookwaterstories.org which explains historic and contemporary waterfront. See Appendix EDC for more on this.

Goal 5.2 says “*Support a workforce development pipeline to connect New Yorkers to well-paying maritime jobs, especially for historically excluded communities.*” PortSide could do this powerfully with building space given our deep knowledge of Red Hook and of maritime harbor wide. PortSide could bring those two communities together and have wanted to since we were founded in 2005.

However, our current year-round, all-weather programming space is just a kitchen and double-wide hallway (the galley and fidley on the ship MARY A. WHALEN), spaces disrupted by the restoration process on this historic ship.

That means we cannot run more than one program at a time, can only service small groups at a time, and forces our programming to be primarily special events as opposed to enrollment programs which are the best way to serve disadvantaged communities because they offer continuity and the possibility for wrap around services. In enrollment programs, participants attend on a regular schedule. See Appendix EDC for more info about the EDC effect on PortSide space and our plans.

Ferries

Though PortSide is a passionate advocate of ferries, we cannot support many of the EDC plans for the NYC Ferry at this time due to the pandemic’s effect on the city budget, nor do we support continued EDC management of the ferry given the EDC’s inability to take much-needed advice, meaning they can’t learn to do better. See Appendix EDC for more about the EDC and NYC Ferry.

The draft CWP posits the NYC Ferry as an amenity for underserved communities, but the ridership analysis released early in 2019 showed that ridership was primarily wealthy white people and tourists, not underserved populations, so did our observations at the Red Hook stop.

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Within a year of the NYC Ferry starting in Red Hook, PortSide pointed out in City Council Waterfront committee testimony and to the EDC that local NYCHA residents were not riding the ferry. The EDC ignored every suggestion PortSide proposed; so on August 22, 2018, we attended the Mayor’s Brooklyn Resource Fair and met with the Mayor, EDC and NYCHA GM and proposed that a NYC Ferry promo mailer be inserted into NYCHA mail to Red Hook tenants. This was approved soon thereafter. The EDC did not act on this commitment before the pandemic. We don’t know if they did that during the pandemic, but we doubt it.

On April 17, 2019, a City Council hearing revealed that many councilmembers representing low-income communities of color were angry about the subsidies the NYC Ferry received, since they had clamored for years for express buses and other forms of transportation. At that hearing, there was a call for the NYC Ferry to be taken away from EDC management and put under the DOT.

During the pandemic months of 2020, the EDC ran the NYC Ferry boats largely empty, subsidizing it further with money taken from other projects such as 42nd Street, and elected officials were again angry that the EDC had taken revenue owed the city when the city budget really needed funds during the pandemic.

<https://nypost.com/2020/06/30/de-blasio-sinks-62m-into-nyc-ferry-despite-covid-19-budget-cuts/>

<https://www.thecity.nyc/2020/9/29/21494763/de-blasio-plugs-ferry-service-with-times-square-dollars>

Given the state of the City budget due to the pandemic, until the city economy recovers from Covid, it seems like the wrong time to invest in capital projects such as expanding NYC Ferry routes and building the Homeport 2 in Atlantic Basin. The proposed expansion plans feel more like Mayor de Blasio trying to cement a legacy project than responsible fiscal management.

Additionally, many voices in Coney Island object to the ferry location chosen by the EDC and their dredging plan. Here is one respected voice, Charles Denson of the Coney Island History Project. <https://www.gothamgazette.com/opinion/9205-we-want-a-ferry-for-coney-island-but-not-like-this>

Lastly, this CWP overview calls for ways to “better connect other ferry landings to adjacent neighborhoods, whether it be providing more bicycle racks or improving wayfinding.” These are other areas where the EDC has refused to respond to local suggestions coming from Red Hook citizens, nonprofits, elected officials and Community Board 6. It is likely that the Red Hook experience is consistent with that of other communities. We heard from the original NYC Ferry marketing team that they were frustrated by the EDC not allowing community promotion info on the docks.

Four years after the start of ferry service in Atlantic Basin, the EDC has not installed signs that label this site as Atlantic Basin, and there is no “you are here” wayfinding map to help people

find their way through this sprawling complex that was only opened to the public a few years ago.

The map to Red Hook installed by the EDC on the ferry dock, a product of the NYC DOT WalkNYC program had little info about Red Hook. It didn't even list the PortSide/Mary A. Whalen as being on site. PortSide proposed that our own sign be installed (more in Appendix EDC) and the EDC refused. They finally installed a new map that includes us, but it still lacks much info about Red Hook. PortSide offered to create our own sign, at our own cost with a design approved by the EDC, with info from our virtual guide to Red Hook. The EDC has refused this proposal multiple times.

PortSide and multiple elected officials have brought these issues to the attention of the EDC, with proposed solutions, and there is no real take-up. Solving these issues is basic customer service, and good customer service means being responsive, something the EDC is chronically unable to do. They make a simple fix impossible.

Lastly, PortSide notes that three of the nine NYC Ferry stops in Brooklyn are currently out of service, a bad maintenance record that suggests that now is not the time for capital expansion, and that the EDC is not a good manager of this system. About 16 months ago, the EDC cancelled the ferry dock maintenance contract with the company that is an expert on ferry docks in this harbor, that is Southern Service Group, Mechanical Division in Bayonne. This may account for the dock maintenance issues.

Emergency management

PortSide is pleased to see emergency management included as a concern in Working Waterfront Goal 3.2 on page 35.

Our suggestions about ensuring boat-friendly pier design also support emergency management. If you design a pier and bulkhead for use by boats, boats can bring economic, educational and cultural activity in good times, AND that same pier can allow boats to serve in various emergency responses, e.g., inbound and outbound movement of goods and people. The 9/11 boatlift was hindered by the boat-unfriendly edge along much of lower Manhattan. More on the maritime response to 9/11 in the webpage memorializing our 2011 exhibit at <https://portsidenewyork.org/911-maritime-response>

Consider adding piers that support heavy lift uses in Manhattan. We think the emergency barge ports used to remove the Ground Zero rubble should not have been removed; they would have been useful for delivering oversize cargo such as massive generators that go on the roofs of major buildings and construction material. Instead, that stuff is trucked through all of Manhattan to reach downtown. A multi-purpose waterfront is a resilient and useful one.

Emergency refueling plan: We want to ensure that an emergency refueling plan is included in the concepts here, that is emergency fueling for vessels. A former crew member of our ship MARY A. WHALEN Captain Rich Naruszewicz drove a ferry during the 9/11 boatlift and has for many

years run a fuel tanker supplying NY harbor vessels. We share and support his suggestions.

He reports that there is currently no official emergency vessel refueling plan. He has created one, and the company he works for seeks a contract to put it into effect. He says there was an emergency refueling plan based on fuel delivery by truck, not put into effect; but trucks may not be able to access the homeports as happened after 9/11 and Sandy when roads and tunnels were blocked or closed, and the truck-based plan required the vessels to return to their homeports rather than being refueled wherever the emergency response may have put them. He points out that safe refueling requires detailed plans due to the diverse fuel intake connections on boats in this harbor to ensure that the refueling team carries the proper fittings. He cites at least 12 sizes for fuel pipe fittings needed to fuel ships in this port. The fittings and the fueling safety rules mean that fueling ships is not one-size-fits-all like fueling a car at a gas station.

Captain Naruszewicz also recommends mass evacuation drills. One was scheduled to occur at the Brooklyn Cruise Terminal in Spring of 2020 but was cancelled due to the pandemic.

Thank you for your time and thoughtful work. PortSide NewYork looks forward to working with City Planning to grow NYC maritime activity serving all New Yorkers! And tourists too!

Regards,



Carolina Salguero
Executive Director
PortSide NewYork

Attachments follow