



Testimony of
Angela Licata
Deputy Commissioner
New York City Department of Environmental Protection
before the
New York City Council
Committee on Environmental Protection, Resiliency, and Waterfronts
June 20, 2025

Good afternoon, Chair Gennaro and members of the Environmental Protection Committee. I am Deputy Commissioner of Sustainability Angela Licata from the Department of Environmental Protection (DEP) and I am here today to discuss the pre-considered intro T2025-3757, which relates to maintenance easements for post-construction stormwater management facilities and civil penalties for violations of the water pollution control code.

I want to start by thanking Chair Gennaro for sponsoring this bill and the committee for hearing it today. I also want to thank the Council staff we have been working with on this legislation. The pre-considered bill would make two straight-forward changes to improve the stormwater management permitting process and strengthen DEP's enforcement of water pollution controls.

As the Deputy Commissioner of Sustainability, I oversee the teams that provide planning, design, construction and operations and maintenance of much of the distributed nature-based stormwater control around the city, including DEP's rain gardens and other green infrastructure. Commissioner Aggarwala and I have discussed this work at several recent Council hearings, so I will not go into great detail here, but anyone who wants to learn more about our green infrastructure work should look at our [2024 Green Infrastructure Annual Report](#), which can be found on the [green infrastructure page of DEP's website](#).

Green infrastructure is a powerful tool for stormwater management that improves the health of our waterbodies, enhances our sewer operations, and distributes important co-benefits that come along with an increase in our green spaces like urban heat island mitigation or diverse habitat for wildlife. We've been building green infrastructure for stormwater control since 2011 and have invested more than \$1.4 billion, with much of that investment happening within the public right of way. But more than 70% of the city is comprised of public or privately held lots and capturing stormwater on these lots and doing so as they redevelop is a cost-effective strategy for enhancing flood resilience through stormwater management and improving water quality through stormwater treatment. This is why we also develop and implement stormwater regulations, including the Stormwater Construction and Maintenance Permitting Program, which is the focus of the legislation being considered today.

DEP launched the Stormwater Construction and Maintenance Permitting Program in 2019, as required under the NYC Municipal Separate Storm Sewer System¹ (MS4) Permit issued to the City by NYS Department of

¹ New York City is served by two types of sewer systems. About 60% of the city has a combined sewer system, in which stormwater and wastewater are transported through the same sewer pipes. About 40% of the city has a Municipal Separate Storm Sewer System, which has separate sewer pipes for transporting stormwater and wastewater.



Environmental Conservation (NYSDEC). This program existed prior to 2019, but it was implemented by NYSDEC and had been since the 90's when the Clean Water Act was amended to include regulatory requirements for MS4s. Under the MS4 permit, we were required to make program enhancements to include more development sites than NYSDEC was regulating. For example, the qualifying soil disturbance threshold was reduced from 1-acre to 20,000 square feet, to account for the more typical redevelopment projects in NYC.

In 2022, the City program was further expanded to apply to combined sewer areas, to help meet both combined sewer overflow (CSO) goals and sewer operations goals. This change is known as the Unified Stormwater Rule, because it created a uniform stormwater policy across sewer capacity and water quality goals and provided more upfront clarity for calculating the requirements. Anyone developing sites must adhere to these rules, including DEP and other city agencies. These regulations have been essential as we evaluate the impacts on our infrastructure of new growth through rezonings and other major redevelopments. In fact, these regulations were so important that they were expedited to meet the Gowanus rezoning schedule so that we could ensure that all redeveloped sites would comply with the enhanced on-site stormwater retention and detention requirements, allowing for a net-zero CSO outlook for the Gowanus Canal and reducing wet weather impacts to our sewers. We are just seeing some of these green infrastructure practices come online now, three years later.

While the benefits of this permitting program are tremendous, we acknowledge that we have work to do to ease the burden on the developer community. We want to support the work that developers do. Our requirements are in place because the opportunity to establish stormwater management upon reconstruction is so great. We have to have management systems on private land, not just public space, so we have to seize these opportunities for on-site controls.

We want the permitting program process to be as smooth as possible, so we have been assessing the process and for the past 18 months we have been intensely workshopping process improvements with developer representatives and the architecture and engineering firms preparing their applications, or Stormwater Pollution Prevention Plans (SWPPPs). Legislative change is one of the steps that we hope to take to ease the process for applicants.

This legislation facilitates rule changes that will streamline parts of the process. Other improvements to the program will include building out and enhancing our Stormwater Permit Tracking System (SWPTS), which was not fully completed when the program was expanded and is cumbersome for applicants and DEP review staff alike. We look forward to continuing working with Council on this legislation to ensure that it implements the changes in a way that best complements our other improvements and that benefits all stakeholders, including DEP, developers, and all residents of the city.

In closing, I want to reiterate DEP's thanks for your partnership on this issue, and for the opportunity to testify about this legislation today. My colleagues and I look forward to continuing our partnership on this. I am happy to answer any questions that you have.

Testimony of
Elijah Hutchinson
Executive Director
NYC Mayor's Office of Climate & Environmental Justice

before the
New York City Council
Committee on Environmental Protection, Resiliency & Waterfronts

June 20, 2025

Good afternoon, Chair Gennaro and members of the Committee on Environmental Protection, Resiliency & Waterfronts. My name is Elijah Hutchinson, and I am the Executive Director of the NYC Mayor's Office of Climate & Environmental Justice (or MOCEJ for short), which is the first Mayoral office to have environmental justice (EJ) in its name. I am joined today by my colleague, Paul Lozito, MOCEJ's Deputy Executive Director for Planning, Adaptation, and EJ. For those who may not be familiar, MOCEJ works to protect **all** New Yorkers from the threats of climate change and extreme weather by creating and advancing policies, programs, and projects that secure the city, while making our critical infrastructure cleaner and more reliable. And throughout all of our work and decision-making, we prioritize addressing a legacy of environmental inequity in our communities.

Since joining MOCEJ as Executive Director in September 2023, we have undertaken great strides to advance efforts to combat climate change and incorporate environmental justice into the city's fabric, demonstrating our office's ability to get stuff done including:

- On my very first day, we released **the City's first-ever long-term energy plan**. PowerUP NYC outlines 29 clean energy initiatives centered on equity, affordability, and health in our move away from polluting fossil fuels and operationalizing our clean energy future.
- **We released the Environmental Justice NYC (EJNYC) Report**, the city's first comprehensive study on the disproportionate environmental burdens affecting low-income communities and communities of color in all five boroughs, and an accompanying interactive online mapping tool that provides policymakers, community leaders, and everyday New Yorkers with over 100 data layers relevant to understanding EJ concerns within New York City.
- As outlined in PlaNYC **we are working with agency partners to launch the City's First Blue Sky Housing Mobility program** to acquire homes facing pronounced flood risk where there are no other viable alternatives to reducing that risk.
- **And we're deep into the planning phase for the city's first Urban Forest Plan** with NYC Parks, City Parks Foundation, and other stakeholders, which will equitably expand

the city's tree canopy to 30 percent to keep New Yorkers safer from extreme heat and flooding, beautify streets and clean the air.

- **With the Office of Management and Budget, we introduced the city's first-ever climate budgeting publication** through the FY25 Executive Budget. Climate budgeting incorporates science-based climate considerations into budget decision-making.
- **And we're in the process of expanding the NYC Accelerator and have developed financing tools and innovative mechanisms to accelerate Local Law 97 compliance by 2030**, including establishing the J-51 Reform tax incentive program, which will help modernize our building stock and reduce utility costs.

Environmental Justice

And the list goes on. But with the release of the EJ Report behind us, we're now taking what we learned and applying it to the development of a multi-agency, citywide Environmental Justice Plan. Working with the experts serving on the Environmental Justice Advisory Board (EJAB), this next step in the EJNYC Initiative aims to level the playing field for all New Yorkers. The EJAB is a critical advisory body for MOCEJ as they assist us in ongoing EJ efforts and are charged with ensuring our work is grounded in the lived experiences of New Yorkers in the city's EJ communities.

Collaborating with more than 20 city agencies and mayoral offices, we're developing recommendations for citywide initiatives and agency specific actions that target investments in communities and public spaces, integrate EJ considerations into city systems and budgeting, enable resilience and efficient building upgrades to protect residents from climate threats and rising energy costs, improve accountability through data transparency and communications, and promote collaboration with community-based organizations serving our EJ communities.

We are also advancing environmental justice through other citywide planning efforts. The aforementioned Urban Forest Plan will address extreme heat and ensure every neighborhood can benefit from trees, which help keep our neighborhoods cool, absorb stormwater, beautify streets, and clean our air.

Introduction 1271

Turning to today's legislation. Introduction 1271 would require MOCEJ to share a draft of the Long-Term Sustainability Plan (also known as "PlaNYC") with the EJAB prior to its release every four years. Through this bill, the EJAB could make recommendations and proposed revisions to the draft.

The Administration is in full alignment with the intent of the bill and is excited to work with Council to ensure environmental justice continues to be a top consideration in all "PlaNYC" policies. However, MOCEJ suggests modification to the order of operations on the consultation with the EJAB. We suggest the proposed local law includes an obligation for MOCEJ to collect information and recommendations from the EJAB as part of the analysis which informs the final

recommendations in “PlaNYC.” Our experience has been that early consultations allow for more opportunities to incorporate suggestions instead of waiting to modify existing recommendations. This achieves the same desired outcome but is more efficient and streamlined from a process standpoint and aligns more with the procedural justice goals outlined in the EJNYC Report.

Introduction 1302

On Introduction 1302, we appreciate Chair Gennaro’s leadership on this topic. Introduction 1302 integrates the objectives of the Long-Term Sustainability Plan (“PlaNYC”), Long-Term Energy Plan, Adaptation Plan, and other MOCEJ initiatives into one cohesive framework. When MOCEJ was created, the Mayor’s Office of Sustainability and the Mayor’s Office of Climate Resiliency were consolidated under one structure as well as the legacy of requirements and obligations stemming back to the original Office of Long-Term Planning and Sustainability (OLTPS). This bill provides a more streamlined and aligned set of mandates for our office. The cumulative impact of Introduction 1302 provides standardized and consistent opportunities for public review of city policies on all climate-related matters, which MOCEJ fully supports.

Thank you for the opportunity to testify. I’d be happy to take any questions you may have.



**NEW YORK CITY DEPARTMENT OF BUILDINGS
TESTIMONY BEFORE THE NEW YORK CITY COUNCIL
COMMITTEE ON ENVIRONMENTAL PROTECTION, RESILIENCY AND
WATERFRONTS
JUNE 20, 2025**

Good afternoon, Chair Gennaro and members of the Committee, my name is Beth Golub, and I am the Director of Sustainability Policy and Legal Affairs at the New York City Department of Buildings. Thank you for the opportunity to provide testimony today regarding the Intro 499 in relation to studying the feasibility of implementing solar-ready measures for commercial buildings.

We appreciate the Council's continued focus on sustainability and the critical role that buildings play in advancing the City's climate goals. As the agency charged with enforcing the City's Construction and Energy Codes, DOB remains committed to implementing policies that promote energy efficiency, reduce greenhouse gas emissions, and ensure safe building practices.

In 2019, the Council passed the Climate Mobilization Act, including Local Laws 92 and 94 of 2019, requiring all new buildings and existing buildings undergoing major roof renovations to install either a solar photovoltaic system, a green roof system, or a combination of both. Since the passage of these laws, buildings across the city have been working to incorporate solar systems or green roofs in accordance with these requirements. These efforts are yielding measurable impacts and helping the city advance toward its climate goals. In 2016, there were 3,902 solar jobs permitted across the city. In 2020, following the passage of LLs 92 and 94, there were 5,172 solar jobs permitted citywide. The number of solar installations has continued to steadily increase with 9,118 solar jobs permitted last year in 2024.

Additionally, DOB is currently working with stakeholders to update the New York City Energy Conservation Code. We look forward to partnering with the Council later this year to pass the legislation necessary to publish the new code. The Energy Code updates will include new

provisions that require on-site renewable energy readiness, including solar. These forthcoming code revisions will align with the Energy Conservation Construction Code of New York State and further solidify solar-ready construction as a standard requirement.

Given the existing requirement for buildings to install solar or green roof systems and the upcoming enhancements to both New York City and State energy codes, we believe that the proposed study is not necessary. The City is already integrating renewable energy into commercial building design and construction, and these efforts continue to evolve through code development and enforcement. We look forward to discussing this proposal and future enhancements to the NYC Energy Code further with the Council.

We thank the Council for its leadership on climate and sustainability and for the opportunity to speak today. DOB remains committed to working with you to build a more sustainable and energy-efficient city.

Thank you.



NEW YORK CITY SOIL AND WATER CONSERVATION DISTRICT

121 Sixth Avenue, Suite 501, New York, NY 10013 ♦ 212.431.9676 ♦ www.soilandwater.nyc

Testimony of New York City Soil & Water Conservation District Before the New York City Council Committee on Environmental Protection, Resiliency and Waterfronts on Intro T2025-3757

Paul S. Mankiewicz
Chair
Bronx Representative

**Commissioner
NYC DEP**
Mayoral Representative
Represented by
Kristin Ricigliano

**Commissioner
NYC DPR**
Mayoral Representative
Represented by
Rebecca Swadek

Allan Ludman
Queens Representative

Damian Griffin
Treasurer
City Council Representative

Thank you for the opportunity to submit this testimony on a local law to amend the administrative code of the city of New York, in relation to maintenance easements for post-construction stormwater management facilities and civil penalties for violations of the water pollution control code.

New York City Soil & Water Conservation District (the District) is a political sub-division of the New York State government with the mission to conserve soil, water and related natural resources; improve water and soil quality; prevent soil erosion and sedimentation; and promote the health, safety and general welfare of New York City residents.

We believe the unified stormwater rule (USWR) is a very important rule that simultaneously addresses both water quality and flooding. We are grateful for the city for adopting this progressive rule. However, we have been made aware that when the rule was expanded to cover the combined sewer system areas, the Department of Environmental Protection did not receive additional staff to manage the program. Program coverage area effectively doubled with the same staffing level, resulting in longer permit processing time.

We support measures that streamline the permitting process without compromising the integrity of the rule. While outside the scope of this intro, we would like to share a few additional measures that would strengthen this program:


1. Add more staff to administer the permits. A modest budget request of \$4 million, as called for by Riverkeeper and other NGOs, would make the USWR run more efficiently and reduce the permit processing time.
2. Consider allocating revenues raised from the permit fees to the USWR program so that the fees paid by the developers will go toward improving the program.

As you know, the USWR is a forward-thinking rule that not only helps the city move toward the Clean Water Act goals through preventing pollutants from entering our waterways but also makes our city more resilient to climate change through reducing flooding from heavy rainfall. The rule is particularly important in areas with a concentration of development projects. There is currently no mechanism to address the cumulative impacts of multiple development projects concentrated in one area. The USWR is the only way to ensure that such areas do not contribute further to water quality impairments or lead to increased risk of flooding.

What is important is that every development project will share the responsibility of managing stormwater, rather than leaving the eventual property owners and the rest of the city to deal with the consequences of development projects.

Thank you for your work in making our city more resilient and sustainable. For our part, the New York City Soil & Water Conservation District is committed to educating and informing the public on stormwater management and climate resiliency issues and will continue our work in partnership with the DEP and other city agencies.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Shino Tanikawa', written in a cursive style.

Shino Tanikawa
Executive Director



**Testimony of Alia Soomro, Deputy Director for New York City Policy
New York League of Conservation Voters
City Council Committee on Environmental Protection
June 20, 2025**

My name is Alia Soomro and I am the Deputy Director for New York City Policy at the New York League of Conservation Voters (NYLCV). NYLCV is a statewide environmental advocacy organization representing over 30,000 members in New York City. Thank you, Chair Gennaro, and members of the Committee on Environmental Protection for the opportunity to testify.

Resolution 926

NYLCV strongly supports Resolution 926 of 2025, sponsored by Speaker Adams, which would declare that the City of New York, in order to reduce greenhouse gas emissions and adapt to a changing climate, adopts the New York State Climate Smart Communities pledge. Climate Smart Communities (CSC) is a New York State program that helps local governments take action to reduce greenhouse gas emissions and adapt to a changing climate. The program offers grants, rebates for electric vehicles, and free technical assistance.

Passing Reso 926 is the first step to becoming a Registered Climate Smart Community. Registered communities have made a commitment to act by passing the CSC pledge. Certified communities are the foremost leaders in the state; they have gone beyond the CSC pledge by completing and documenting a suite of actions that mitigate and adapt to climate change at the local level

The impact of this proposed action is huge. To date, 9.6 million people in 440 municipalities around New York State live in a community that has adopted the New York State Climate Smart Community pledge. With New York City's adoption of the pledge, an additional 8 million people will be added to this list, nearly doubling it. This is a critical sign of solidarity to the cause of climate action, strengthening the city's and state's reputation as leaders in effort to address this existential threat. Also, by taking this pledge, New York City will be in a stronger position to access state funding from the Climate Smart Communities grant program. NYLCV urges the City Council to swiftly pass Reso 926.

Intro 1271

NYLCV supports Intros 1271, sponsored by Council Member Gennaro. Intro 1271 would require the Office of Long-Term Planning and Sustainability to provide drafts and proposed revisions of the long-term sustainability plans, otherwise known as *PlaNYC*, to the Environmental Justice Advisory Board (EJAB), and would require EJAB to review the drafts and proposed revisions and make recommendations to OLTPS prior to the finalization of the long-term sustainability

plans. This is a common-sense bill since environmental justice should be intertwined with any sustainability proposals that are part of future *PlaNYC* amendments.

Intro 1302

Additionally, NYLCV supports Intro 1302, sponsored by Council Member Gennaro, which would require the Office of Long-Term Planning and Sustainability to quadrennially publish the long-term energy plan and the climate adaptation plan within its update to the long-term sustainability plan (*PlaNYC*). The requirements of the long-term sustainability plan would be further amended to remove the requirement that it include a wind resource assessment. The bill would also dissolve the energy policy advisory subcommittee and the climate change adaptation task force and would transfer some of the responsibilities of these entities to the sustainability advisory board, which would now be required to include a representative of the energy industry. This is another common-sense bill that would consolidate and streamline some of the different reporting requirements that OLTPS is required to undergo at different points in time.

Intro 499

NYLCV supports Intro 499, sponsored by Council Member Abreu, which would direct DOB, with assistance from DEP, FDNY, and any other relevant agency, to conduct a year-long study to determine the feasibility of implementing solar-ready measures for commercial buildings. Solar is an essential component in the City's efforts to move away from fossil fuel-generated electricity, both in the public and private spheres. When it comes to the private sector, this bill will help the city understand the feasibility of commercial buildings installing solar ready measures. We recommend that this bill be more specific when it comes to identifying the financing aspect of installing solar-ready measures; more specifically, the availability (or lack thereof) of incentives, grants, and other financing tools at the federal, state, and local levels for commercial buildings. This review should also consider zoning and permitting impediments to solar installations.

Thank you for the opportunity to testify.

TESTIMONY OF THE QUEENS & BRONX BUILDING ASSOCIATION
IN SUPPORT OF T2025-3757
JUNE 20, 2025

Good morning. I am Robert Altman and testify today in Preconsidered Intro. No T2025-3757. I testify on behalf of the Queens & Bronx Building Association.

First, we would like to thank Council Member Gennaro and the Department of Environmental Protection for hearing our concerns about the length of time to get approvals on Storm Water Pollution Prevention Plans. This is an area of concern not only for the industry but a number of Council Members have also expressed concern to us with the delays the current set-up creates regarding parks and other projects that are important in their districts. This bill represents an excellent first step in addressing everyone's concerns.

Second, we would like to request and look forward to working with your office and DEP's offices in the drafting of the regulations. We hope that these regulations are drafted expeditiously so that other concerns can be addressed and so that we achieve the twin goals of speedier approvals and the minimization of storm water pollution.

Again, thank you and we support the bill.



SWIM Coalition

Stormwater Infrastructure Matters

June 20, 2025

Testimony of [Michelle Luebke](#)

On behalf of Stormwater Infrastructure Matters (SWIM) Coalition

Before the New York City Council

Committee on Environmental Protection, Resiliency and Waterfronts

on Intros 0499-2024, 1271-2025, 1302-2025, T2025-3757, and Resolution
0926-2025

My name is Michelle Luebke, and I am the Program Manager at the Stormwater Infrastructure Matters (SWIM) Coalition. Thank you for the opportunity to deliver public testimony and thank you to Chairman Gennaro and members of the Committee for your leadership on behalf of environmental protection, climate resiliency, and protecting water resources in NYC.

SWIM Coalition is a group of 70 organizations dedicated to ensuring swimmable and fishable waters around New York City through sustainable stormwater management practices — both green and grey infrastructure. SWIM Coalition member organizations endorse a truly sustainable view of watershed management, one that restores ecological systems, creates local economic opportunities and equitably distributes the benefits of green infrastructure. SWIM Coalition has long advocated for nature-based solutions to address flooding, stormwater, and climate resiliency, not only because green infrastructure has the capability to manage water in highly urbanized areas, but also because of the myriad co-benefits associated with greening our cities.

Intro 0499-2024

While the SWIM Coalition supports climate change and resiliency measures, we would like to see a broader implementation of green roofs in conjunction with solar, since the co-location of the two optimizes the function of both (i.e. LL 92/94).

Intro 1271-2025

As environmental justice advocates, the SWIM Coalition supports the recommendations of the Mayor's Office of Climate and Environmental Justice (MOCEJ) to include the Environmental Justice Advisory Board (EJAB) in the process of developing plans, reviewing drafts, and proposing revisions of long-term sustainability plans, like PlaNYC, with the Office of Long-Term Planning and Sustainability (OLTPS) and support giving the EJAB power to participate in the process, not just review and make revisions prior to the finalization of any long-term sustainability plans.

Intro 1302-2025

The SWIM Coalition supports 1302 regarding reporting requirements of the office of long-term planning and sustainability. We support updating and streamlining these requirements to improve climate governance and require the City's climate adaptation plan to follow the International Panel on Climate Change (IPCC) and New York City Panel on Climate Change (NPCC) timeline.

In section I.4., we support the consideration of the potential impact of identified resiliency and adaptation measures. However we recommend this section be more specific as to what types of impact should be considered: induced flooding, water quality, and waterfront access are some of the specific potential impacts.

As part of the Rise to Resilience Coalition, we have advocated to pass Local Law 122, which established a Five Borough Climate Adaptation Plan. This plan, which is included in Intro 1302, would include recommendations for resiliency and adaptation measures to protect residents, property, and infrastructure throughout the city. Through identifying areas that are highly vulnerable to climate hazards, it will help determine where resiliency and adaptation measures should be prioritized for implementation. Local Law 122 has the potential to be the backbone for climate resilience in New York City but has yet to be fully realized. We urge the City Council, and this Committee in particular, to hold Mayoral administrations accountable for the delayed implementation of this law.

T2025-3757

The SWIM Coalition supports the Department of Environmental Protection (DEP) in fully implementing the Unified Stormwater Rule (USWR). We understand the intent of this intro to be streamlining the permitting process, and if so, we support.

Additionally, we would like to emphasize that the USWR would run more efficiently if DEP has more staff, and the fee paid by the permittee should be spent on hiring DEP staff to administer the permits. The USWR is a strong defense against future flooding and must be preserved.

Resolution 0926-2025

We support the City adopting the New York State Climate Smart Communities pledge.

Respectfully submitted,



Michelle A. Luebke | Program Manager
advocacy@swimmablenyc.org

On behalf of the SWIM Coalition Steering Committee:

Mike Dulong – Riverkeeper

Larry Levine – Natural Resources Defense Council

Leonel Lima Ponce – Pratt Institute

Christian Murphy – Bronx River Alliance

Holly Porter Morgan – Lehman College

Em Ruby – Riverkeeper

Shino Tanikawa – NYC Soil & Water Conservation District



PUBLIC TESTIMONY OF WATERFRONT ALLIANCE

June 20, 2025

New York City Council Committee on Environmental Protection, Resiliency and Waterfronts RE: Streamlined Reporting and Stormwater Permitting

Submitted by Tyler Taba, Director of Resilience, Waterfront Alliance

My name is Tyler Taba, and I am the director of resilience at the Waterfront Alliance. Thank you, Chair Gennaro, and members of the Committee, for the opportunity to submit testimony.

Waterfront Alliance is the leader in waterfront revitalization, climate resilience, and advocacy for the New York-New Jersey Harbor region. Waterfront Alliance is committed to sustainability and to mitigating the effects of climate change across the region's hundreds of miles of waterfront. We convene the Rise to Resilience Coalition of 100+ groups advocating for policy related to climate resilience, we bring education focused on climate resilience to students in NYC DOE schools through our Estuary Explorers program, and we run the national Waterfront Edge Design Guidelines (WEDG®) program for promoting innovation in climate design.

I am grateful to submit testimony today in favor of improving engagement with environmental justice communities, streamlined climate reporting, and making good on long-overdue climate adaptation planning for New York City.

New York City has witnessed, firsthand, the risks and impacts that climate change poses to our residents, infrastructure, and natural resources. We can see the dire projections that experts at the International Panel on Climate Change (IPCC), and our own New York Panel on Climate Change (NPCC), have laid out for us. The reality is that many of the projections are being realized today. Flooding events are the most common climate-related hazard across the city.¹ The city has also experienced other types of extreme weather occurrences, including over 40 extreme heat events and over 20 winter storm events and extreme winter weather emergencies in the last 10 years.²

¹ Rebuild by Design. *Atlas of Disaster: New York*. <https://rebuildbydesign.org/atlas-of-disaster-new-york-state/>

² NYC Emergency Management. *Hazard History & Consequences Tool*.
<https://nychazardhistory.com/PublicSearch.aspx>



It's clear that climate risks and impacts are no longer abstract or projections of the future, and that the City needs to take direct and bold action immediately. This action starts with comprehensive, long-term planning for climate resilience in New York City, which will dictate how funding can and should be spent.

We thank Chair Gennaro for introducing Intro 1271-2025 and Intro 1302-2025, which are precisely related to improving long-term climate planning. **Waterfront Alliance supports Intro 1271 to require review of the long-term sustainability plan, PlaNYC, by the environmental justice advisory board. We encourage the City to coordinate with the Environmental Justice Advisory Board and other environmental justice coalitions before the PlanNYC drafting process begins.**

By embedding environmental justice into the evaluation process, this legislation ensures that the City's strategies intentionally consider and address the needs of historically underserved and overburdened communities. This fosters greater transparency and community engagement. Additionally, Waterfront Alliance believes that effective long-term planning for climate adaptation and resilience must center the voices of environmental justice communities, who face the greatest risks from climate change, alongside input from all boroughs and the broader public. Int 1271-2025 is a necessary step toward inclusive and equitable climate action.

Additionally, Waterfront Alliance supports Intro 1302 in relation to the reporting requirements of the office of long-term planning and sustainability. We support updating and streamlining the reporting requirements to improve climate governance and requiring the City's climate adaptation plan to follow the International Panel on Climate Change (IPCC) and New York City Panel on Climate Change (NPCC) timeline.

It is worthy to note that Waterfront Alliance and our [Rise to Resilience Coalition](#) partners led the advocacy campaign to pass [Local Law 122](#), which established a Five Borough Climate Adaptation Plan. This plan, which is included in Intro 1302, would include recommendations for resiliency and adaptation measures to protect residents, property, and infrastructure throughout the city. It would also identify areas that are highly vulnerable to climate hazards to help determine where resiliency and adaptation measures should first be implemented. **Local Law 122 has the potential to be the backbone for climate resilience in New York City but has yet to be fully realized. Most critically, we urge the City Council, and this Committee in particular, to hold Mayoral administrations accountable for the delayed implementation of this law.**



With respect to the long-term energy plan component of Intro 1302, we strongly recommend the City adheres to New York State's Climate Leadership and Community Protection Act (CLCPA).

Lastly, Waterfront Alliance expresses general support for T2025-3757. This bill streamlines the stormwater permitting process by allowing developers to obtain construction permits before recording a maintenance easement. It is our understanding that the current process requires establishing a maintenance easement prior to the start of construction, which can lead to several month delays from Stormwater Pollution Prevention Plan (SWPPP) approval to start of construction. At the time of this testimony, we continue to evaluate this preconsidered legislation and will contact Chair Gennaro's office directly as we learn more.

Thank you, Chair Gennaro and Council Members, for hosting this important hearing today. Waterfront Alliance continues to advocate for practical solutions and for dedicated, long-term funding and planning for climate resilience for New York City. And we look forward to partnering with the City Council to advance all these recommendations and initiatives. I am happy to discuss these matters in more detail with you at any point.

Tyler Taba

Director of Resilience, Waterfront Alliance

ttaba@waterfrontalliance.org

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1302 Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Paul Onyx Lozito

Address: _____

I represent: Mayor's Office of Climate

Address: 253 Broadway

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 1271 ¹³⁰² Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Eliah Hutchingson

Address: 253 Broadway 8th floor

I represent: Mayor's Office of Climate and Environmental Justice

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 6/20/05

(PLEASE PRINT)

Name: Angela Licata

Address: Deputy Commissioner

I represent: DEP

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. T2025-3757 Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Melissa Enoch

Address: 59-17 Junction Blvd Flushing NY

I represent: NYC DEP

Address: _____

◆ Please complete this card and return to the Sergeant-at-Arms ◆

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 499 Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Beth Golub

Address: _____

I represent: NYC Department of Buildings

Address: _____

◆ Please complete this card and return to the Sergeant-at-Arms ◆