



City of New York Parks & Recreation



**New York City Council
Committee on Parks & Recreation**

**Introduction Number 123 of 2010
(Surface areas of playgrounds and playing fields)**

April 15, 2010

**Testimony by
Thérèse Braddick
Deputy Commissioner for Capital Projects**

INTRODUCTION

Parks' Capital division is responsible for building and rebuilding playgrounds, green areas, nature centers and recreation centers in parks across the city. We have an excellent team of architects, engineers, landscape architects and other professionals dedicated to improving parks for all New Yorkers. New York City is in the largest period of park expansion since the Robert Moses era of the 1930s. With a capital budget of almost \$2 billion over the next four years, we are building innovative parks and facilities at an unprecedented scale across the city.

Parks takes seriously its responsibility to provide the safest places for New Yorkers to play and recreate, and we are happy to see that the Council is joining us in our efforts. We have an obligation to keep our playgrounds and playing fields safe, and while we thank the Council for expressing their interest and concern on this issue, we cannot support the bill as currently drafted. Before I give specific comments on Introduction 123 of 2010, I would like to take a moment to explain our current practices when we install new surfaces in our parks.

CURRENT PRACTICES

The Parks Department takes great efforts to ensure we are installing the safest materials at all of our Parks sites throughout the city – it is our number one priority. We are fortunate enough to employ professional staff who, along with other experts around the country, have been at the forefront in establishing national standards for certain products like safety surfacing, synthetic turf and play equipment. For many years, members of our staff have served on various committees and, as such, are voting members of the American Society for Testing and Materials (ASTM International). The purpose of these committees is to write standards for materials, products, systems and services. This technical expertise and familiarity with industry standards is applied directly to the Parks Department's projects.

We are constantly looking for innovative yet safe ways to improve play environments, especially for children. We access various consumer publications, engineering briefs, industry periodicals

and studies which explore new materials. If a new product is proposed for use in a landscape design, our Specifications & Estimating Unit is called upon to research technical studies and reports, and review guidelines from the ASTM, American National Standards Institute (ANSI), and the Consumer Products Safety Commission (CPSC) to ensure products meet all relevant requirements. In addition, our staff consults with medical practitioners and other experts from private firms and public agencies across the country.

I also want to highlight that we work closely and have a collaborative partnership with the Department of Health & Mental Hygiene in researching, assessing and recommending new materials. DOHMH has been instrumental in guiding Parks on testing protocols, information on new and existing materials, New York State Department of Environmental Conservation (DEC) standards and research studies so we at Parks know that we are providing safe and healthy environments for all New Yorkers. We are in constant contact with DOHMH sharing ideas and asking for advice on health-related issues. We feel very fortunate to have such great partners.

Current Testing and Safety Practices

In addition to extensive research on new products, we also require that all materials installed in parks are tested according to the strict ASTM standards.

For example, for pre-molded mats, we require four different tests prior to installation. These include:

- A shock absorbency test, which must ensure that a surface can absorb a shock force of 200 times the acceleration of gravity in order to protect against debilitating head injuries.
- An accelerated weathering test that subjects the material to consistent freeze-thaw cycles and sustained heat exposure. After this test, the material is once again tested to make sure the material has not lost its ability to protect against head injuries.
- A slip resistance test that ensures a material is not slippery when wet.
- A flammability test to ensure that the material does not catch on fire.

For synthetic turf:

- Prior to installation, our contractors are required to test the material (both infill and fibers) for lead, chromium and zinc. None of the heavy metal levels can exceed the EPA accepted levels.
- After installation, the contractor must engage an independent lab to perform a field test to ensure that the turf meets the ASTM standards for head injury as mentioned above. A second test is performed during the guarantee period to make sure that the field still meets all requirements.
- To address heat issues, we also install misting stations at all of the fields, and all playground rules signs (located at entrance points) notify park users that “no bare feet” are allowed in order to protect against hot surfaces.

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INTRODUCTION 123 of 2010

As mentioned above, Parks strictly follows ASTM and CPSC standards when designing and procuring equipment, and welcome input from outside experts. Additional input from a committee or task force could further assist the Parks Department in evaluating new materials. Despite our support for the creation of this type of advisory group, however, we have several concerns about Introduction 123 as it is proposed.

Delays in Parks and Playground Improvement Projects

First, and most importantly, this bill would significantly delay the Parks Department's ability to renovate existing parks and playgrounds by halting work on design and procurement pending a pre-defined timetable and recommendation of the task force. Our efforts to take advantage of new and emerging technologies and provide the latest, safest, more cost effective protection to our park users will be hindered by a prescribed potentially lengthy review and recommendation process outside of the agency. According to the bill, it appears that any use of new materials first requires a review by the Department of Health & Mental Hygiene, although that review is not defined. The Health Department will then share its review with the advisory committee, which may meet as rarely as twice a year. Once the advisory committee issues its recommendations, Parks will then have 60 days to issue a response to those findings. Finally, the bill appears to require that Parks wait another 60 days after issuing its response before actually using the materials.

These mandatory time-frames will undermine our ability to take advantage of emerging technologies and new products which, after having gone through a lengthy review process, may no longer be the most optimal product on the market, thus dating the value of the advisory committee's opinion. For any new or renovated park or playground, we have to be very specific about what type of surfacing will be included in the contract before it can be bid out. If we have to wait for the completion of this proposed review process in order to get approval to use a new type of surfacing, it could be months after we've completed a design before we could even start construction and install a new product. Delaying needed repairs and installations will leave the public with fewer opportunities to access higher quality recreational materials and equipment.

Committee Composition

Our second concern is that the bill does not require the members of this advisory committee have any particular technical or scientific expertise. If an independent review of new materials is to have any use, it must be conducted by unbiased professionals who review the materials on an empirical basis. The bill's failure to require that is problematic. In fact, there are almost no standards for participation in this committee, including its composition, the length of terms of its members, or its leadership. We would be happy to work with the Council to come up with recommended qualifications for the committee.

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Environmental Review

Parks construction projects fully comply with environmental review requirements under State and local law. Manufacturers of playing surfaces are required to meet standards of the United States Consumer Products Safety Commission, ASTM, or building codes and Parks reviews the specifications of products before purchase to assure that relevant standards are met. Parks also reviews materials for other health and safety concerns (such as lead in synthetic turf carpet fibers) as these become known.

While we support measures that promote safe and healthy play environments for our children, we believe Introduction 123 adds an unprecedented environmental review component to the City's contracting process. The bill overlooks the importance of the CPSC and ASTM in setting nationally recognized standards for determining what materials are properly used in City parks and playgrounds.

CONCLUSION

The Parks Department shares with the City Council the goal of doing all that we can to make sure our surfacing materials are safe. We look forward to working with you on this and other issues.



TESTIMONY OF MARK COSTELLO, PAST PRESIDENT,
DOWNTOWN LITTLE LEAGUE (MANHATTAN)

BEFORE THE PARKS COMMITTEE OF THE CITY COUNCIL OF
NEW YORK ON THE SUBJECT OF PROPOSED LEGISLATION TO
CREATE AN ADVISORY PANEL ON NEW AND FUTURE
SYNTHETIC TURF DESIGNS FOR CITY PARKS

APRIL 15, 2010

Madame Chairperson, Distinguished Members

Of the Committee:

Good morning. My name is Mark Costello. I am a parent in Tribeca, an attorney, and a past president of Downtown Manhattan Little League. I testify today on behalf of a coalition of Manhattan youth leagues and summer camp providers serving more than two thousand annual registrants in Chelsea, Greenwich Village, Soho, Tribeca, and the Lower East Side. On behalf of all our families, coaches, volunteers, sponsors and - most of all - our kids, I thank you for this opportunity to speak.

Our thirteen years' experience with synthetic all-weather fields, from the crude and early "carpet" technologies to the sophisticated, all-organic infills now coming on the market, has proven the transformational importance – and huge popularity – of these unique and year-round sports facilities. Without all-weather fields, our organizations would be forced shorten our seasons by months per year and turn away hundreds of kids. The effect across the City of reduced or delayed access to new all-weather fields would be enormous.

An advisory body to help evaluate new-to-market turf materials could certainly play a productive role in building better sports facilities. But in our view, it is important that the activities of any such group not be structured in a way that impedes or discourages innovation by the City. The synthetic turf industry is constantly improving its products, often in ways that are specifically responsive to environmental and/or safety concerns. Fields being designed and built today in Europe, and at cutting-edge locations in the United States, are greener, safer, more durable, and therefore most cost-effective over an extended life of heavy service than even the best products of three years ago. It would be unfortunate if the result of legislation were to "stick" the City with second-rate designs and yesterday's technology, or to delay the construction of these badly needed fields.

Instead, an advisory panel should be structured to provide the best possible assistance to the Parks Department in its ongoing efforts to

improve our hugely popular and heavily used community sports facilities. Any advisory entity should provide a forum to bring forward the combined expertise of park users, sports providers, educators, environmental scientists, and safety and health professionals. The group should not be inserted into the already elephantine procurement process in a way that penalizes new designs and hinders rational decision-making.

We believe the Parks Department will listen to responsible and practical input from the full range of stakeholders in our public sports facilities.

And that's a win for everyone.

Thank you.

Mark Costello
Downtown Little League
mcostellony @ gmail.com
646-831-9069



Comments to NYC Council Legislation Text

Thomas Paino
646 359-0284

Intro. No. 0123-10

April 15, 2010

Since 1997 the NYC Department of Parks has followed an aggressive campaign to convert playing fields to artificial turf having little or no collaboration with other government entities let alone with the community. As prices for the product escalate and the dangers associated with its use multiply, the secretiveness and opaqueness in the planning of such fields heightens. Anything that would break through this darkness would help. Intro. 0123-10 is a start, but does not go far enough.

Let me call your attention to the John Murray Playground (JMP) renovation in the Hunters Point section of Long Island City as an example of sportsfield improvement gone awry. JMP is not a park, but rather a mostly hard surfaced, full block playground surrounded by densely packed buildings and other impervious areas. The neighborhood's extensive, large-footprint industrial buildings along with lack of open space (ranks 42 out of 51 on the City's open-space ratio list and suffers from one of the highest levels of heat island effect) is the reason that on every community survey, natural green space appears at the top of the needed amenities list. It is the reason that Hunters Point is the home of the City's largest green roof (Silvercup Studios) and why the Mayor chose this area to inaugurate his cool roof coating initiative. This is definitely not the place for petroleum derived turf that heats up to 140 degrees F.

Due to a protracted funding process the Parks Department held three public hearings on JMP improvements over the course of 4 years and included a new comfort station (deleted from the current program), a completely refurbished tot lot and general improvements to the entryways and fencing. At no time was artificial turf presented. Through frequent contacts with CB2 it was learned, in late summer 2009, that the Parks Department was planning to rip up the existing asphalt playing field (approximately 1/3 of the playground) and replace it with artificial turf. It was also learned that JMP was targeted for such destruction by plaNYC (p. 31) back in 2007. When the lack of community in-put, throughout this targeted history, was brought to the attention of Parks through letters and a petition signed by hundreds, we were told that the public process was followed since the artificial turf plan was presented to the CB2 Land Use Committee. CB2 confirmed that this was not true. (CB2 also overwhelmingly voted against an artificial turf "Common" proposed for the new Hunters Point South waterfront park.) Parks has still not produced the minutes of this alleged meeting after repeated requests by residents and community organizations.

In addition to the obvious health issues (VOC off-gassing, bacteria {human, animal and bird} transmission, over heating - a cardiovascular threat, increased sports' injuries) and

environmental issues (flooding due to increased run-off, heat island effect, lack of natural vegetation, kills the soil below, harbors foul smelling bird droppings), there is the social issue. The JMP sportsfield is used by many different groups for a variety of activities. If the Parks Dept. had contacted the community it would have learned about the Ecuadorian soccer events held every Sunday. This is not only a sporting event, but rather a major social event for this thriving immigrant community. Both men and women of all ages flood to these games during the course of the day to eat, socialize and root for their favorite team. The game is played with a smaller ball than the typical European version and according to the master coaches cannot be played on artificial turf due to the potential for increased injury. Even if this was not the case, it is doubtful that the Parks Dept. would accept the Ecuadorian application for a permit to play on the new field as typically these fields are open to the entire City and somewhat of a mystery as to gets to play on them (see last September's Juniper Park, Middle Village turf war controversy and Randall's Island sportsfield controversy).

Yes, please make the process of resurfacing sportsfields more transparent by opening up all the issues, not just health related ones. At the very least the requirement for Design Commission approval should be enforced and the community needs to be represented on the advisory committee. Please help make our parks safe and environmentally sound for all users.



Testimony

Of

**Nancy Clark, MA, CIH, CSP
Assistant Commissioner
Bureau of Environmental Disease Prevention**

before the

New York City Council Committee on Parks and Recreation

regarding

Intro. 123 Relating to Surface Areas of Playgrounds and Playing Fields

April 15, 2010

250 Broadway
New York, NY

Good morning Chairperson Mark-Viverito and members of the Parks Committee. My name is Nancy Clark and I am the Assistant Commissioner for Environmental Disease Prevention for the Department of Health and Mental Hygiene (the Health Department). On behalf of Commissioner Farley, thank you for the opportunity to discuss Intro 123 and the importance of evaluating new surface materials for playgrounds and playing fields. We support the spirit of Intro 123 and the formation of an advisory committee to assist the City in its ongoing identification and evaluation of new surfacing products used in playgrounds and playing fields. However, we share some of the same concerns described by Deputy Commissioner Braddick and cannot support the bill as proposed.

For the past few years, the Health Department has been actively engaged in assessing potential health and safety concerns related to synthetic playing surfaces and providing ongoing technical assistance to the Parks Department. We have issued two reports on synthetic turf and environmental health issues; the first detailed a comprehensive review of the scientific literature on rubber infill synthetic turf and the second described air quality at synthetic turf playing fields. These reports, while identifying the presence of contaminants, found that the degree of exposure through ingestion, skin contact or inhalation is likely to be too small to increase the risk for any health effect. Subsequent studies by other researchers have found similar results. However, we did identify the potential for heat stress exposure at synthetic playing fields and recommended that heat mitigating strategies be implemented to prevent heat-related illness.

We have developed a strong partnership with the Department of Parks and Recreation's planners and continually provide input on surfacing materials, laboratory test methods to assess potential contaminants, recent scientific research, and recommendations for safe use of playing surfaces. We remain committed to this partnership and to promoting safe and healthy opportunities for children and adults to participate in physical activities in parks and playgrounds.

We agree that an advisory committee can be an important asset for the City's assessment and use of new playing surfaces; however, it is important that members of such a committee be designated for their expertise in relevant scientific and professional fields. Without appropriate expertise and experience, the advisory committee's ability to offer factual and useful input would be greatly limited. We recommend that membership on the committee include environmental health scientists, safety and medical professionals, landscape architects and park planners, athletic directors and physical exercise professionals, as well as representatives from user groups. In addition to providing recommendations on new playing surfaces, an advisory committee could also provide a forum for information exchange about playing surfaces and feedback from parent groups and users of playgrounds and playing fields. Recommendations and input from the advisory committee can promote selection of the best technologies, address areas of concern, develop public information on safe and healthy use, and give community members who use City playgrounds or playing fields a chance to voice their opinions. The role of the advisory committee should be formulated to provide relevant expertise and stakeholder input without duplicating effort or introducing unnecessary barriers to selecting and installing playing surfaces.

Opportunities for active recreation and physical activity have never been more important in our city. Over the past 20 years, obesity levels have doubled in the United States, and in New

York City, obesity is epidemic. More than half of adults and nearly half of young children in New York City are either overweight or obese. Unhealthy weight gain, even during childhood, is related to diabetes, heart disease, asthma, and depression. Supporting better nutrition and extending opportunities for physical exercise are the best ways to promote healthy weight and prevent chronic health problems related to obesity. We live in a densely populated city with limited open space, and sports fields are in short supply. It is critical that we promote, not impede, the use of innovative products that can provide greater access to safe and healthy recreation in our parks.

I thank you for the opportunity to discuss this important issue. We look forward to continuing our work with the Council towards the goal of making New York City a better, safer and healthier city.

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NATURAL RESOURCES DEFENSE COUNCIL

New York City Council Parks and Recreation Committee
Hearing on Int. No. 123

Testimony submitted by Albert Huang, Attorney
Natural Resources Defense Council
April 15, 2010

The Natural Resources Defense Council (NRDC) is a non-profit national environmental advocacy organization headquartered in New York City with more than 1.2 million members and on-line activists nationally, and over 20,000 members and online activists in New York City.

On behalf of our members, NRDC would like to express its strong support for Intro Number 123, regarding the creation of an Advisory Committee to the City on materials used for surface areas of playgrounds and playing fields. NRDC believes this is the first important step to developing a long-term, sensible process in which to balance the City's need for additional high quality park surfaces with the City's strong commitment to promoting environmental sustainability and protecting the public's health and safety.

Two years ago NRDC, New Yorkers for Parks, and New York Lawyers for the Public Interest, testified before this same committee urging immediate attention and action to the issue of the potential environmental and health impacts of artificial turf. We were concerned with the environmental impacts of turf (i.e. stormwater runoff, urban heat island effect); the potential health threats posed by toxic materials used in turf (i.e. heavy metals and other toxic chemicals in tires); and the safety of people playing on the fields when the fields get very hot in the summer. At the time, there was growing national concern regarding the safety of these fields and we urged the City to take leadership in ensuring the turf fields were safe. We issued four recommendations at that hearing: (1) the City consider issuing a moratorium on the installation of artificial turf pending an environmental and health review of its safety; (2) the Council support legislation to suspend projects until a study was completed by City Department of Health and Mental Hygiene (DOHMH); (3) the City request a full environmental review of all proposed turf projects; and (4) the City examine whether there were environmental justice impacts of turf fields. Shortly thereafter, the Department of Parks and Recreation (DPR) discovered high levels of lead on a City turf field and the field was subsequently closed. This resulted in a temporary moratorium on new turf surfaces and a lengthy scientific literature review by the DOHMH. This also resulted in

signage on turf fields warning users about the potential health impacts related to heat on the fields. This was substantial progress on an important issue that affects thousands of New Yorkers.

Int. No. 123 presents the next significant step to reaching a long-term solution to the environmental, health, and safety concerns associated with these playing surfaces.

That said, NRDC believes the legislation could be significantly strengthened in three ways:

- (1) There should be more detail on what makes a surfacing material subject to the requirements of this bill and what details of the materials must be reviewed. Specifically, we recommend changing the language in the bill to fully reflect the range of different types of turf and subsurface support mechanisms that might be employed on a playground or playing field. It is important to provide specificity so as to avoid the prospect of crafting a bill that does not fully capture the full universe of materials it's intended to review.
- (2) The Advisory Committee should be independent, have representation from diverse members of the community with expertise in public health, environmental justice, environmental, parks, and recreation issues; and have more time to deliberate. To this end, we recommend the bill include language regarding the membership of the Committee and setting aside seats for each of the public interest groups listed above. This would also require an expansion of the membership of the Committee from five, as currently drafted, to ten (which would allow for two representatives from each of the interest groups). Finally, we recommend that the Committee have 60 rather than 30 days to submit recommendations to allow for robust and meaningful input.
- (3) There should be a more meaningful exchange between the Advisory Committee, DOHMH, and DPR. For the review to be meaningful, the bill should require that DOHMH and DPR respond directly to the proposed Committee's recommendations in writing and, if necessary, hold a public hearing to allow others in the public to comment.

In summary, NRDC strongly supports Int. No. 123 and looks forward to working with all of you and your staff to move the legislation forward.



**New York City Council
Parks & Recreation Committee
Int. 123 – Regulation of New Surfacing in Parks
April 15, 2010**

Good morning. My name is Cheryl Huber and I am the Deputy Director at New Yorkers for Parks. We are the citywide, independent organization dedicated to ensuring that all New Yorkers enjoy a world-class park system. New Yorkers for Parks has worked to ensure greener, safer, cleaner parks for all New Yorkers for more than 100 years.

Background

For five years, New Yorkers for Parks has been closely researching and following the issue of artificial turf, beginning with our 2006 position paper, "A New Turf War." New Yorkers for Parks, along with a coalition of environmental and health groups such as Natural Resources Defense Council (NRDC) and New York Lawyers for the Public Interest (NYLPI), has long advocated for an overarching citywide policy to ensure the safety of surface materials in parks. We are glad to see that Int. 123 begins to address this need.

This legislation requires the Department of Health and Mental Hygiene to seriously review new surfacing materials prior to purchase by any agency. New Yorkers for Parks met with a coalition of groups and DOHMH and DPR over the course of two years to discuss and work to address safety issues, ongoing testing, maintenance, installation and removal of artificial turf fields. New Yorkers for Parks strongly supports and has long advocated for a comprehensive review by city agencies that will delve into the details of potential toxicity, heat, and environmental impacts. An independent advisory committee will play an essential role in vetting these reviews.

While the agency requires certain testing from manufacturers of such materials, independent oversight is not part of the process. By instituting an independent advisory committee, the

legislation provides one more level of scrutiny by groups who do not stand to make a profit from the sale of such materials.

Recommendations

While New Yorkers for Parks strongly supports the spirit and intention of this legislation, we have several recommendations to strengthen its impact as well as the work of the agencies and advisory committee.

1. Advisory Committee. The key to successful review of new surfacing materials is the formation of an independent advisory committee that includes informed experts from public health, environmental, parks, and recreation groups. Because of the great task with which the committee will be charged, we recommend that the committee be enlarged to 10 members and that they are allotted 60, rather than 30, days to assess information provided by the City's initial review. This will ensure that committee members have the capacity to fulfill their obligations seriously while meeting the responsibilities of their full-time jobs.
2. Public process. New Yorkers for Parks recommends that the Health Department's review and the Advisory Committee's report be made public and that the agencies be required to hold a public hearing on the work. This will allow stakeholders an opportunity to offer comments and will provide greater opportunity for public buy-in. As with the environmental review process, we recommend that the agencies be required to respond to substantive comments in writing.
3. Definition of "new materials." We recommend that clarifying language be added to the bill to ensure that all impacts are identified prior to purchase. Full review should be completed when new components of surfacing materials are introduced, including subsurface drainage, infill materials, or blades of turf. It is essential that new iterations of artificial turf, which are introduced with some regularity, are held to this review process. Agencies should be required to assess these materials against alternative surfaces and technologies, including natural turf.

We support Int. 123 and its intention to subject new surfacing materials to a stringent review process vetted by an independent Advisory Committee, and we thank the committee for its work to address this important issue.

**Testimony of Gavin Kearney, New York Lawyers for the Public Interest
Regarding Introduction Number 123 of 2010
April 15, 2010**

Good morning chairperson Mark-Viverito and members of the Committee and thank you for the opportunity to provide testimony today. My name is Gavin Kearney, and I am the Director of the Environmental Justice Program at New York Lawyers for the Public Interest (NYLPI). NYLPI is a nonprofit civil rights law firm whose Environmental Justice Program works with communities of color and low-income communities throughout New York City on environmental matters.

For several years, NYLPI has been working with other stakeholder groups, including the Natural Resources Defense Council and New Yorkers for Parks, in an effort to ensure a sensible approach to artificial turf. While recognizing the growing demand for quality athletic fields in New York City, our organizations are concerned about the environmental and public health impacts of moving from grass to turf. Such concerns have arisen around issues such as storm water runoff, particularly in light of New York City's overtaxed sewer system, urban heat island effects, the presence of toxins in turf, and health risks to turf users due to its potential to reach high temperatures during hot weather. These impacts seemed in clear tension with larger efforts to increase our City's sustainability and we were particularly concerned that the shift from grass to turf was happening rapidly and in the seeming absence of a deliberate and transparent process for carefully evaluating impacts and weighing competing concerns.

NYLPI supports this legislation as an important step forward. It is sensible planning for the Departments of Health and Mental Hygiene and Parks and Recreation to evaluate thoroughly the potential environmental and health impacts of any surfacing material prior to using it. In addition, having an independent advisory committee review these evaluations, and having them posted on-line, will serve to ensure the thoroughness of these reviews and add a measure of accountability and transparency to the process. There are several ways in which we think that the legislation could be modified to strengthen the degree to which it furthers these important objectives.

In order to ensure the proper evaluation of new surfaces, we recommend that Section (a) be amended to:

- Specify that new materials and new technologies be subject to review (e.g to ensure that a new type of recycled rubber infill not avoid review on the ground that another infill that also uses rubber material had previously been evaluated).

- Specify that such review applies not just to the turf or playground surface, but also to drainage systems, infill and cushioning materials, blades and other elements of an installation that impact on health and the environment.
- Specify that the review fully evaluate impacts that would result from the widespread installation of a material or technology where such is possible.
- Specify that, as part of the review, the impacts of using a particular material or technology be assessed in comparison to other available alternatives.

In order to ensure the effective functioning of the advisory committee, we recommend that Section (b) be amended to:

- Ensure that the committee is truly independent. This can be accomplished by specifying that a substantial number of members be unaffiliated with the City and by requiring representation on the committee from key stakeholder groups, specifically environmental organizations, park advocacy organizations, recreation organizations, and environmental justice organizations.
- Ensure that the committee has the ability to review and comment effectively on draft reports by expanding the size of the committee from five to fifteen members and extending the amount of time that the committee has to comment on a draft report from 30 to 60 days. We are concerned that the current bill places a heavy responsibility on five individuals who serve in a volunteer capacity and without staff support, namely the responsibility of thoroughly evaluating what could be lengthy and technical reports in a relatively short period of time. Expanding membership and the review period will ensure a broader range of expertise and increase the ability of the committee to engage in a thorough evaluation.

Finally, we think that inserting a public review component will strengthen the bill. Specifically, we recommend that the bill be amended to state that:

- Draft reviews be presented to the public in addition to the advisory committee.
- DOHMH and DPR hold a hearing to present the review and receive questions and comments from members of the public.
- Members of the public have an opportunity to submit written comments to the departments and that the final review address substantive comments received.

Adding these public review measures would strengthen the quality of review and give voice to stakeholder groups that may not have membership on the advisory committee. It would also be done without substantially increasing time and resource demands upon the departments and without delaying the overall process.

Again, thank you for the opportunity to provide testimony. We look forward to working with you and members of your staff to advance this legislation.

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 123 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: NANCY CLARK - ASSISTANT

Address: ~~1234~~ COMMISSIONER

I represent: DOHMH

Address: _____

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in favor in opposition

Date: 4/15/10

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Name: TOM A. PAINS

Address: 45-14 11th ST.

I represent: myself + neighbors

Address: _____

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in favor in opposition

Date: 15 APR 10

(PLEASE PRINT)

Name: Peter Johnson

Address: 45-12 11th ST. LIC

I represent: myself + neighbors

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

**THE COUNCIL
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[]

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Date: _____

Name: Geoffrey Croft (PLEASE PRINT)

Address: _____

I represent: NYC PARK ADVOCATES

Address: _____

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Date: _____

Name: Cheryl Huber (PLEASE PRINT)

Address: 35th Lex. 14th floor

I represent: New Yorkers for Parks

Address: _____

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[]

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in favor in opposition

Date: 4/15/10

Name: Albert Huang, NRDC (PLEASE PRINT)

Address: 40 W 20th St NY, NY 10011

I represent: NRDC

Address: _____

**THE COUNCIL
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I intend to appear and speak on Int. No. 123 Res. No. 121

in favor in opposition

Date: 4/15/10

(PLEASE PRINT)

Name: GAVIN KEARNEY

Address: 151 W 30TH ST. NY NY

I represent: NYLPS

Address:

**THE COUNCIL
THE CITY OF NEW YORK**

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I intend to appear and speak on Int. No. 123 Res. No. _____

in favor in opposition

Date: 4/15/10

(PLEASE PRINT)

Name: Therese Braddick

Address: Deputy Commissioner

I represent: NYC Parks & Recreation

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: 4/15/10

(PLEASE PRINT)

Name: Mark Costello

Address: 40 White #3

I represent: Manhattan Sparks League

Address: Douglas Little League

295 Greenwich Box 157 NY NY

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