

**FoH Remarks Delivered at a Public Hearing
on the Draft Local Waterfront Revitalization Plan
and Generic Environmental Impact Statement**
January 20, 2010

My name is Christopher Reed. I am Board President of Friends of Hudson.

Our organization's interest in the Hudson waterfront goes back more than ten years. For much of that time, our efforts took the form of organized citizen opposition to proposals which, had they been implemented, would have severely compromised community health and Hudson's economic revitalization. Our view has always been that healthy communities place a high value on diversity, appropriate scale, and reducing, if not eliminating, toxic pollution.

Our interest in the Local Waterfront Revitalization process grows directly out of those campaigns. The latest phase to complete a viable LWRP began in 2006. Well before the beginning of this cycle, Friends of Hudson was an advocate for a waterfront that realizes its fullest potential. In 2002, we were founding members of the South Bay Coalition, established to promote a long range plan of action to restore this important ecosystem.

Believing that many of the controversies of the Hudson waterfront are fundamentally problems of design, Friends of Hudson identified several world class planners and designers skilled in working directly with communities to come up with ingenious, attractive solutions to specific challenges. Given the right opportunity, such expertise remains potentially available to the City to turn liabilities into assets.

In May of 2007, a Friends of Hudson task force provided detailed comments on an earlier draft of the LWRP. We are gratified to see that some of our suggestions were incorporated into the present draft as well as the Draft Generic Environmental Impact Statement.

Even though we have not been shy about pointing out where we thought the LWRP process, and the draft plan itself, was flawed, I want to use this opportunity to acknowledge the members of Waterfront Steering Committee under Linda Mussmann and their consultants Cheryl Roberts and BFJ Associates for their hard work and dedication.

There are definite gains in this latest cycle of the LWRP that should be emphasized. One is the expanded definition of the waterfront study area to include large areas of open space further inland. This broader focus and the call for greater integration of the waterfront into the City is significant not only recreationally and scenically but also because it more accurately reflects a functioning watershed that is larger than what we usually think of as such.

Another advance is the latest zoning map which replaces a predominantly industrial overlay with more diversified recommended uses. Such variegated zoning, especially if wisely implemented, can produce a more dynamic urban setting, both economically and socially, than a monoculture.

If this public hearing offers a chance for citizens to further improve the Waterfront Plan, then in that spirit, I want to devote my remaining time to the South Bay and the trucking alternatives presented in the DGEIS.

We share the consensus that the current routing of aggregate trucks through Hudson neighborhoods must be replaced by a better alternative. The DGEIS and draft LWRP would have benefited incalculably had there been a professionally facilitated design session (or series of sessions) to which ALL stakeholders had the opportunity to come up with the best design solution. Then we would have been subject to the

discipline of balancing two perspectives of the South Bay, one having to do with truck transportation, a matter of land and hard surfaces, the other with hydrology, the movement of water. We have repeated old patterns by devoting so much attention to the South Bay as delivery system for Becraft Mountain limestone at the expense of the South Bay as a wetland ecosystem, valuable not only for its scenic and recreational potential, but for its potential contribution to managing the overburden of runoff to the City's combined sewage system.

There is little doubt in my mind that had there been such a community-based design exercise, as other cities have done, the preferred truck route now on the table would connect Bay Road (otherwise known as 9G and South 3rd Street) to South Front Street along the south side of L&B. Among this option's advantages are:

- it does the least damage to the South Bay by circumventing it
- it keep open more opportunities for the future improvement of the South Bay
- it provides public access and is not limited to O&G trucks
- it uses existing grade crossings and land already owned by the City
- it is an already paved route with which many City residents are familiar
- the road can be upgraded and expanded with fewer disruptions to the existing wetland and would have less need for mitigation than the proposed "causeway" option

Planning 101 considers the best solutions first and obstacles to implementation second. It often happens that a concept, if well considered, creates its own momentum for realization. In the case of the DGEIS, I suspect that the options were prioritized on the reverse basis, based on what the authors deemed most immediately doable rather than what is the best long-term solution.

That said, the DGEIS does contain in several places promising language about the role the South Bay can play in helping manage storm water. There is also mention of the need for more hydrological analysis to know what's actually going on in this Class I wetland and to identify future opportunities for restoration and blue belt design.

I will end by pointing out that peak precipitation events affecting Hudson's water management infrastructure are increasing in frequency and intensity due to changing weather patterns. Case in point is a low spot on Bay Road near the entrance to Mount Merino Road (not far from the proposed causeway) that is subject to more frequent flooding such as occurred in April 2007 and perhaps as recently as last July. These weather changes are being recognized by other Northeast municipalities, especially those with combined treatment systems such as New York and Philadelphia, and new wetland strategies are being created.

A hydrological study of the South Bay is the obvious next step for us. Without one, the DGEIS cannot say, as it does now, that the proposed truck route through the middle of the South Bay does not have impacts which require mitigation.

Thank you.

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