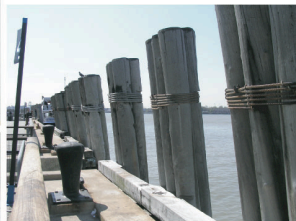
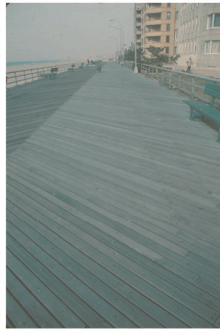


THE RAINFORESTS OF NEW YORK: *a Trail of Destruction*



**A Response to
Mayor Bloomberg's
Tropical
Hardwood
Reduction Plan**



**7th in the
Rainforest Relief Reports
Series of
Occassional Papers**



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EXECUTIVE SUMMARY

The history of New York City's boardwalks is the history of the devastation first of the temperate forests of North America and then in the tropical forests of the tropics.

Logging is the key factor leading to deforestation in the tropics. According to UNFAO, seventy percent of deforestation directly caused by clearing for agriculture is *precipitated* by logging roads. The World Resources Institute (WRI) converted this figure and stated that a logged forest in the tropics is *eight times more likely* to be completely deforested than one remaining unlogged.

In 1994, after ascertaining that the boardwalk in Coney Island had recently been replaced with tropical hardwoods, Rainforest Relief (RR) began a campaign to end the use of tropical hardwoods by New York City. With more research, RR concluded that the government of NYC is the single largest consumer of tropical hardwoods in North America.

Other organizations have worked on the issue at various times since then. The New York City chapter of Sierra Club joined in the campaign in 1996 and with RR, worked to pass City legislation to supplement NY State legislation that banned the use of certain tropical woods by the State government and municipalities within the state. The City Council bill did not pass and Sierra Club has not been involved since 2001. A new grassroots group, New York Climate Action Group (NYCAG), joined the campaign in mid-2007.

In December of 2007, in response to recent campaign actions, Mayor Michael Bloomberg, in a speech at the Climate Change talks in Bali, Indonesia, announced his call for a plan to “reduce reliance” on tropical hardwoods by the City of New York. In a subsequent speech at the United Nations on Feb. 13, 2008, the Mayor announced the release of the Tropical Hardwoods Reduction Plan (hereafter, “the Plan”). The Plan represents a significant step towards addressing the issue of the city's contribution to tropical deforestation and thus, climate change. However, by allowing for the future use of tropical hardwoods on a large scale — in fact, a significant *increase* in use, including for as-yet-unbuilt installations — the plan falls far short of its potential. Given that the city government now realizes the impact on tropical forests and the concomitant carbon emissions, this plan seems in opposition to the Mayor's commitment to reduce the city's contribution to climate change. Further, with the Plan as it is currently written, agencies may now feel free to proceed as usual within the milieu of the weak policy statements and proposals of the current administration. Thus the Plan is a guidepost for continued large-scale destruction of tropical forests.

The Plan — a memorandum from the Mayor's Office of Long-term Planning and Sustainability (OLTPS) addressed to the Mayor and Commissioners of various city agencies — contains numerous significant flaws, including misinformation on the structural capabilities and availability of a number of alternative materials. These flaws skew the findings of the report towards the continued use of tropical hardwoods.

One of the most significant aspects of the Plan is that it proposes to reduce the use of tropical hardwoods by only 60% *by 2020*. As the single largest end-user of tropical hardwoods in North America, this level of continued use of these materials by city agencies is unacceptable. The level of logging necessitated to continue to produce the amount of tropical hardwoods used annually by the city — even within the Plan's parameters — will hasten the destruction of tropical rainforests. In fact, the Plan's schedule for reductions follows precisely along the estimates for the ongoing destruction and total demise of tropical forests and would thus not contribute in any significant way to slowing deforestation. The Plan as written thus would do nothing to alleviate the concomitant greenhouse gases produced from the resulting deforestation.

New York City Department of Parks and Recreation (DPR) should be credited for the changes they have made. Until this year, DPR was the city agency using the most tropical hardwoods — and thus the largest single consumer in North America. However, the “immediate” 20% reduction in tropical hardwoods use cited in the Plan comes from decisions made within DPR. These decisions were made prior to the Plan developed by OLTPS and prior to the Mayor's office weighing in on this issue.

It is clear from these and other factors that OLTPS has not taken the steps available to address this issue in any meaningful way that would quickly eliminate the use of tropical hardwoods by the City and thus more quickly address the City's contribution to climate change.

The failure to consult with experts left OLTPS in a position of lacking accurate information on what is possible in terms of alternatives. Thus OLTPS' approach to individual agencies was one of reporting on (and bowing to) whatever the agencies proposed, rather than making proposals and compelling agencies to do more.

This lack of expertise becomes most apparent and significant with OLTPS' communications with NYC Department of Sanitation (DSNY). As written in the Plan, DSNY is planning eight new marine transfer stations (MTSs), four of which have already been designed, with three of those to be constructed using large amounts of greenheart (*Chlorocardium rodiei*). OLTPS insists that the plans for the MTSs have been in the works for five years and are thus unable to be altered in any way. The Plan reveals that the first three of the stations will be construction in late 2008 and early 2009 and that two more are already designed and will be constructed within the next two years, also likely using greenheart.

RR's preliminary examination of the designs for these stations suggests that recycled plastic lumber (RPL) could easily replace the greenheart in all applications. Yet OLTPS has not engaged DSNY on this, nor consulted with anyone familiar with the capabilities and use of RPL. If the administration were truly taking tropical deforestation and the resultant climate change seriously, assembling a team of engineers and consultants familiar with the use of RPL and other alternatives would seem to be the first step. Utilizing these experts to educate staff and agency personnel could follow. Then OLTPS could make recommendation to agencies regarding this issue, as they have in PlaNYC. Yet, in the case of tropical hardwood use, OLTPS has instead chosen to interview the agencies and accept whatever inadequate approaches each agency has suggested.

Ultimately, the Plan proposes a long-term phase-out of tropical hardwoods that will reduce the use of these materials by the City by only 60% by 2020. Estimates are that all accessible rainforests will be destroyed by 2040. That is, the Plan calls for a reduction of tropical hardwoods that precisely follows the path of a decrease of availability of these woods due to the elimination of the forests from which they are procured. This tack approaches the inane and one might consider it an absurd joke, if OLTPS was not so serious about their report, as they expressed in a meeting with RR and NYCAG in September of 2008. The proposed phase-out will in no way alter the outcome of the demise of rainforests nor reduce the City's contribution to greenhouse gas emissions from deforestation.

The City must do much more. DPR has had 13 years to address the use of tropical hardwoods since RR first raised the issue in 1995. Regardless of time lost, DPR has shown that a phase-out of the use of these materials can be accomplished within a few years. RR first brought the issue to DOT in January of 1999. The agency has done nothing to address the issue since then, ignoring letters, postcards and protests alike. In the midst of protests targeting other agencies, DSNY moved forward to design four new MTSs with tropical hardwoods. It is simply unacceptable that, given the Mayor's statements regarding climate change, that DSNY be allowed to move forward to purchase an additional \$1M on tropical hardwoods for installations yet to be built, committing the City to driving the logging of thousand of additional acres.

More and more, city parks are being designed and constructed by development corporations that are often partnerships between city agencies, state agencies and the private sector. These entities do not fall within the control of the City.

The maintenance of existing parks is being handed over to public/private 'conservancies', such as the Central Park Conservancy:

Other such entities include Prospect Park Alliance and Better Conservancy. These entities are being given control over decisions around design of new facilities as well as purchasing materials for new structures and maintenance of existing structures. Public benefit corporations have established their own park-operating groups, such as the Battery Park City Parks Conservancy.

City land is often leased to private entities and public funds are given to others restoring City landmarks, such as the South Street Seaport.

The most troublesome examples of the above, in terms of tropical hardwood use are Hudson River Park (HRP, administered by Hudson River Park Trust, HRPT), Battery Park City, Battery Park, Brooklyn Bridge Park (including Empire-Fulton Ferry State Park) and South Street Seaport.

For instance, HRPT recently installed another boardwalk that encompasses approximately 19,000 board feet of ipê. The ipê boards in the new boardwalk and those newly used to replace some sections of the main asphalt walkway are composed of 8'-long, 8"-wide ipê boards that are 3"-thick. Each board consumes 16 board feet of Fine European Quality (FEQ, comparable to four-side-clear — that is, beams with all four sides clear of knots or defects) ipê. Rainforest Relief estimates that to produce this amount of FEQ ipê would necessitate the logging of over 250 acres of primary rainforests, or 1.7-times the land area of Hudson River Park^{oo}. Ironically, this structure is called the Nature Boardwalk (it's surrounded by newly-planted native grasses and plants).

The New York City Transit Authority (NYCTA), now a division of the Metropolitan Transit Authority (MTA), a state agency, uses extremely large amounts of ekki, logged from West Africa, for subway track ties. Research has suggested that

tropical hardwoods have been in use for subway track ties as far back as 1911^{oo}. RR has identified ekki in numerous recent subway track renovations, including on the 2, 6 and G lines as well as the train yard at Shea Stadium. NYCTA has admitted to using ekki for almost all new subway track repairs^{oo}. In 2001, RR uncovered a pending purchase of ekki from a company buying logs from Liberia, connecting the supply of wood to the funding of weapons purchases and terrorism by the notorious then-president of Liberia, Charles Taylor^{oo}.

SRPL has been tested and used in numerous railways around the country for more than 12 years^{oo}. Chicago Transit Authority has used more than 100,000 RPL ties in its Elevated system^{oo}. NYCTA has tested about 100 ties but has yet to purchase any for installation in any of the lines that have been renovated since testing began more than 8 years ago^{oo}.

SRPL is perfect for railroad crossties. The material will last far longer than wood, is non-conductive and doesn't soak up oils or other liquids, making it less likely to catch fire^{oo} (a significant cause of service disruptions).

The Plan states:

To reduce New York City's contribution to global greenhouse gas emissions and lessen the City's role in the destruction and deforestation of tropical rainforests the City will significantly cut its reliance on tropical hardwoods.

According to this plan, the City's use of tropical hardwoods will double over the next two years and due to the use of tropical hardwoods in new marine transfer stations, this use will continue at an increased level for many years to come.

In a graph shown in the Plan, OLTPS estimates that tropical hardwood use will be reduced by 20% by 2009 and by 60% by 2020.

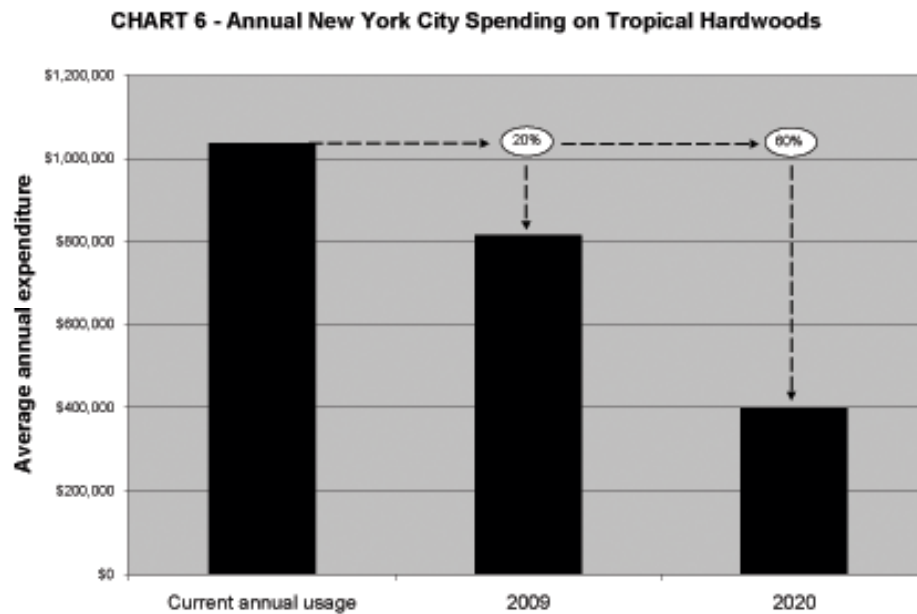


Figure 59. Graph of estimated reductions by NYC resulting from the Plan. For its starting point, the graph ignores the new marine transfer stations and also the large-scale uses of tropical hardwoods by public benefit corporations.

Yet, in the text of the Plan, a different story is depicted. Given the use of greenheart by DSNY and the time it will take DOT to evaluate alternatives, a different outcome is revealed.

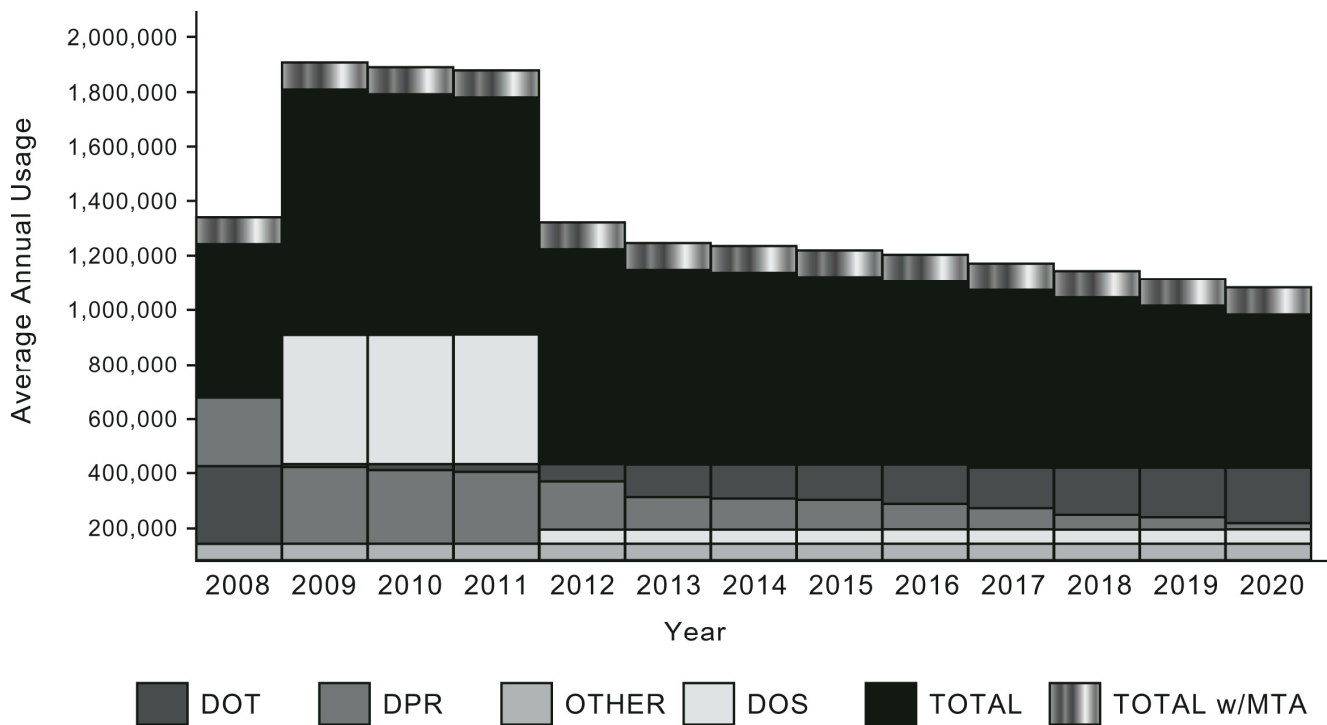


Figure 60. Estimate of current use and reduction of use of tropical hardwoods by New York City government agencies. This graph does not include the use by MTA/NYCTA, which would likely add another \$100,000/year.

Recommendations

- **OLTPS should use the power of its office to compel City agencies to *immediately* eliminate the use of tropical hardwoods.** This *can* be done. Examination of proposals, RFPs and designs by Rainforest Relief and engineers familiar with alternative materials suggests that for each use of tropical hardwoods by a city agency, an alternative exists that can be employed either immediately or in the next renovation phase (that is, within the next three-to-five years).

Design studies should be undertaken immediately by agencies, with the guidance of OLTPS (Rainforest Relief is ready to help). Commitments similar to the one made by DPR can be made by DOT, DSNY and other City agencies, including public benefit organizations.

A series of seminars should be planned and promoted by OLTPS for the engineers and designers within City agencies and outside entities. These seminars can utilize the readily-available expertise entirely ignored by OLTPS in formulating the existing Plan. Rainforest Relief, along with New York Climate Action Group, is planning the first such seminar but, unfortunately, without the assistance or even sanction of OLTPS.

- **Any plan by the city must address the use of tropical hardwoods by other entities building city infrastructure.** Public benefit corporations, park conservancies, city/state partnerships and others can and should address this issue. OLTPS has the power to reach these organizations but has ignored this option in the Plan.
- **The Plan must also address the use of tropical hardwoods by the New York City Transit Authority.** While MTA is not beholden to policies passed at the city level, NYC has a great deal of power to influence MTA policy when it comes to NYCTA. The Plan should call on MTA to eliminate the use of tropical hardwoods for subway track ties in the City.
- **The Plan should address the use of tropical hardwoods by the private sector within the City.** The city should make an effort to drive consumption within the City away from these incredibly damaging materials. At first, the Plan can seek to educate consumers about the issue and suggest alternatives (perhaps with a database on the City's

website, as has been done in other cities) and later can begin to regulate the imports and sales of tropical hardwoods within the City's borders.

- **Not only must the city act immediately to completely end its use of tropical hardwoods but should also take steps to mitigate the damage caused by more than forty years of use** and the deforestation that has already resulted. RR estimates that 110,000 acres of rainforests were logged in Brazil to produce the millions of board feet used by DPR for the first conversion of 12.5 miles of boardwalk to ipê. The agency is in the midst of the second rotation of tropical wood on the City's boardwalks. **RR estimates that another 10,000 acres were logged in Guyana to produce the greenheart used by DOT for the Staten Island Ferry terminals and the Brooklyn Bridge Promenade.** The Plan should commit the City to mitigating past damage. This can be done in any number of creative ways, including funding reforestation efforts, assisting programs to end the use of these materials in other cities and taking steps to end the use of tropical hardwoods by the private sector within the city. Rainforest Relief is prepared to work with OLTPS to draft a plan to achieve these goals.