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SPECIAL REPORT

A PARK POLICY PAPER



Raising the Tide: Strategies for New York City Beaches



**NEW YORKERS
FOR PARKS**

Ensuring greener, safer,
cleaner parks, together.

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TABLE OF CONTENTS

Executive Summary

1.	Introduction	1
2.	The Parks Department: 1987 – 2007	3
3.	Roles of Governmental Agencies in Public Beach Operations	4
4.	City Beaches and Community Needs	5
5.	Lifeguards and Staffing	11
	Recommendations	15
6.	Maintenance and Inspections	17
	Recommendations	20
7.	Water Quality	21
	Recommendation	24
8.	Public Notification: Lessons from Other Cities	25
	Recommendation	25
9.	Conclusion	26
	Appendix: New York City Department of Parks and Recreation Response	27

EXECUTIVE SUMMARY

Fourteen miles of New York City's 578-mile waterfront are composed of public beaches operated by the NYC Department of Parks and Recreation (DPR). Nearly 21 million visitors spent time at the seven beaches during the summer of 2006. Located in four of the five boroughs, the seven public beaches provide recreation, relaxation and a respite for residents and tourists:

- Coney Island/Brighton Beach, Brooklyn
- Manhattan Beach, Brooklyn
- Midland Beach, Staten Island
- Orchard Beach, Bronx
- Rockaway Beach, Queens
- South Beach, Staten Island
- Wolfe's Pond Beach, Staten Island

"Raising the Tide: Strategies for New York City Beaches" discusses important issues that have been brought to the table by community groups, city agencies, and advocates. The primary issues impacting beach users, along with New Yorkers for Parks' recommendations to address them, are as follows:

Lifeguards and Staffing:

A chronic shortage of lifeguards leads to closed sections of the beach every summer.

Recommendations:

1. Improve recruitment by administering training where there is demand and enhancing the transparency of testing.
2. Double the salary for lifeguards at underserved beaches as a pilot program.
3. Expand youth swimming opportunities in partnership with the Department of Education.

Maintenance and Inspections:

According to Health Department inspection data, beach facilities such as bathrooms need additional maintenance.

Recommendations:

1. Implement "Operation Relief" for beach bathrooms in order to improve maintenance and reduce health code violations.
2. Increase the transparency of Park Inspection Program (PIP) results and include bathrooms and drinking fountains in a beach's rating.

Water Quality:

Although water quality in NYC has improved in recent decades, the city still has a long way to go in terms of reducing water pollution.

Recommendation:

1. Use and promote stormwater management strategies when developing land throughout the city to improve beach water quality.

Public Notification:

Information on local beach conditions needs to be improved.

Recommendation:

1. Establish a NYC Beach User's Guide on the Web that provides a variety of essential health, safety, and user information drawn from multiple city agencies.

I. INTRODUCTION – NYC PUBLIC BEACHES

Fourteen miles of New York City's 578-mile waterfront are composed of public beaches operated by the NYC Department of Parks and Recreation (DPR). These beaches range from ocean shores to bay front sites and are officially open and staffed with lifeguards from 10 a.m. to 6 p.m. between Memorial Day and Labor Day.¹ Nearly 21 million visitors spent time at New York City beaches during the summer of 2006, including 1 million people over Memorial Day weekend alone.² Public beaches provide recreation, relaxation, and a respite for residents and tourists every year.

The seven city beaches are located in every borough except Manhattan:

- Rockaway Beach, Queens
- Coney Island/Brighton Beach, Brooklyn
- Manhattan Beach, Brooklyn
- Orchard Beach, Bronx
- Midland Beach, Staten Island
- South Beach, Staten Island
- Wolfe's Pond Beach, Staten Island

Although multiple city agencies are involved in the operations of public beaches, the Parks Department is ultimately responsible for keeping municipal beaches safe, clean, and open to the public. Through a discussion of issues including staffing, facilities management, and water quality, this report will highlight the Parks Department's successes in this role, identify challenges, and offer policy recommendations for the future.

The mayor's recently announced sustainability initiative, PlaNYC 2030, sets ambitious and admirable targets to ensure the health of NYC's environmental infrastructure as the population grows by a projected 1 million residents in the next 25 years. In particular, the goal to "open 90% of our waterways for recreation by reducing water pollution and preserving natural areas" will enhance accountability for improving the cleanliness of beaches and reducing closure and advisory days. The ambitious parks component of the plan promises increased investment in regional parks, local playgrounds, Greenstreets (landscaped traffic medians), trees, and public plazas. This has had significant implications for the Parks Department's Fiscal Year 2008 Capital and Expense budgets and could necessitate new strategies for managing a quickly expanding system.

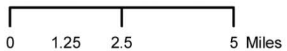
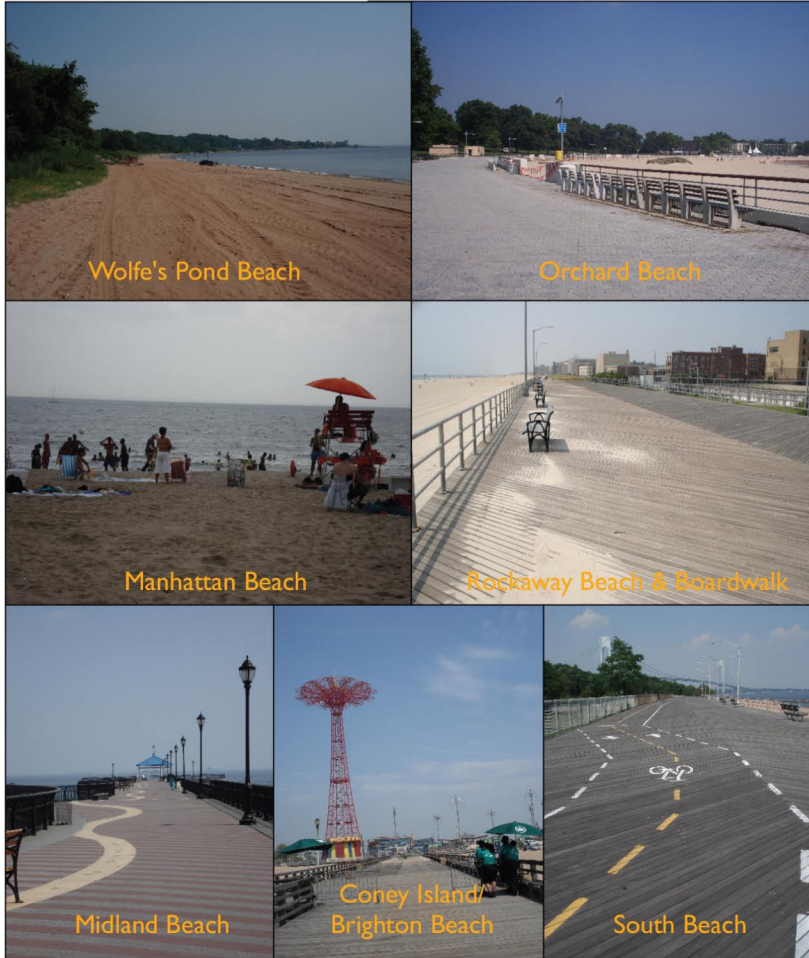
In tandem with the release of this report, New Yorkers for Parks is publishing its first *Report Card on Beaches*, modeled after *The Report Card on Parks*. New Yorkers for Parks conducted independent inspections of all seven NYC public beaches in order to benchmark conditions and provide the public with information on the maintenance of their beaches. The report is available to download at www.ny4p.org.

Through these publications, New Yorkers for Parks aims to raise awareness of some of the issues associated with urban beaches, as well as to enhance the policy dialogue regarding their maintenance, management, and operations.

¹ DPR. "Frequently Asked Questions: Does Parks manage the beaches?" Retrieved May 2006 from http://nycgovparks.org/sub_faqs/park_faqs.html#e8

² Department of Parks and Recreation testimony, City Council Oversight Hearing on "Managing the Erosion of City Beach Properties," held by the Committee on Waterfronts. 16 Jan 2007.

New York City Public Beaches



2. THE PARKS DEPARTMENT: 1987–2007

After several decades of declining funding and staffing, the Parks Department's expense budget has only recently begun to rise.³ The agency's operational strategies for the most part continue to reflect measures that were put in place due to a history of insufficient funding, such as a maintenance staff largely composed of welfare-to-work participants and an increasing reliance on private funding and management.

To compensate for a massive loss in full-time staffing, the department began, in the late 1990s, to depend on workfare participants to provide basic park maintenance. Today, the vast majority of workfare participants employed by the DPR are Job Training Participants, or JTPs, who are eligible to receive paid, short-term positions maintaining parks. In fiscal year 2006, nearly 7,000 individuals were employed by the Parks Department under full-time or full-time equivalent status, and more than 30% of these (2,269 employees) were JTPs.⁴ Though these staff members are extremely valuable and are often the only official "eyes and ears" in parks, they remain in these positions for only six months. JTPs receive training in very basic maintenance tasks, and they are typically not familiar with the Parks system, making it difficult for them to address or report maintenance needs.

During the busy summer season, the DPR hires full-time "seasonal staff," who work alongside JTPs. Seasonal staff includes maintenance workers as well as playground associates, who provide programming, supervision, and light maintenance essential to the operations of beaches, pools, and parks during the summer months. Funding for these positions was threatened year after year until the fiscal year 2008 budget negotiations, when the mayor and City Council baselined the \$7.3 million needed for seasonal staff. Although this action does not guarantee funding for the future, it does make it more politically challenging to cut these positions.

The declining Parks budget has triggered an influx of capital and operational funding from private sources in recent decades. The Central Park Conservancy and the Bryant Park Corporation were formed in response to the communities' demand for additional care for these parks, and rely on private funding for 85% and 100% of their budgets, respectively.⁵ Though private management and funding have helped to reestablish these parks as urban destinations, public-private partnerships have also highlighted the disparity in services between these and smaller neighborhood parks that generally rely solely on public funding. Flagship parks like Prospect and Riverside have been the most common beneficiaries of this newfound private support.

Because there is little publicly accessible data on private funding for park properties, New Yorkers for Parks has been unable to determine the level of private funding, if any, that has been directed toward capital or maintenance projects at city beaches. However, several beach advocacy and volunteer groups, such as the Rockaway Waterfront Alliance, the American Littoral Society, and Friends of South Beach, have been waterfront stewards, spending time maintaining and organizing cleanups of NYC beaches.

With the launching of PlaNYC 2030, nearly \$1 billion in capital funds are projected to be spent by the Parks Department over the next ten years. Capital projects will include the reconstruction or development of eight major regional parks; the opening of schoolyards after hours; the construction of new Greenstreets; and the planting of street and park trees throughout the city. As these impressive projects are completed in the coming years, the need for consistent maintenance funding will be extremely important.

³ NYC Office of Management and Budget. Adopted Budgets, FY 1986–FY 2008.

⁴ Citizens Budget Commission, "Making the Most of Our Parks," June 2007.

⁵ "About the Central Park Conservancy," Central Park Conservancy. Retrieved July 2006 from www.centralparknyc.org/aboutcpc. "Park Management," Bryant Park Restoration Corporation. Retrieved July 2006 from www.bryantpark.org.

Unlike parks, public beaches are subject to the City's Health Department (DOH) regulations to ensure that they remain safe and sanitary. For example, the health code requires that the DPR post a lifeguard for every 50 yards of open beach, and the conditions of bathrooms and other beach facilities must adhere to a series of cleanliness measures. The DOH ensures that these standards are met through regular inspections of beaches in the summer months. The Health Department has no involvement, however, in monitoring the health and safety aspects of other park properties. Because of this, one could reasonably assume that beach bathrooms may be in better condition than park bathrooms.

One of the difficulties in examining beach-specific management issues is that there have been no independently benchmarked conditions to enable advocates to measure the efficacy of the DPR's beach operations. In light of this, New Yorkers for Parks has established a survey of public beaches. For *The Report Card on Beaches*, trained surveyors conducted inspections of the maintenance conditions of all seven NYC public beaches. The methodology and survey mechanism were developed based on focus group research and are modeled after New Yorkers for Parks' *Report Card on Parks*, the citywide evaluation of more than 100 neighborhood parks. *The 2007 Report Card on Beaches* is published in tandem with this policy paper.

3. ROLES OF GOVERNMENT AGENCIES IN PUBLIC BEACH OPERATIONS

Several city agencies play important roles in ensuring that NYC public beaches are safe, clean, and open to the public:

NYC Department of Parks and Recreation

All seven of the city's public beaches are owned and operated by the Parks Department. The department maintains and monitors the sites and facilities just as they do all parks across the city. Beach facilities and shorelines may require different management techniques than parks because they are open only three months out of the year. In addition, the Health Department requires enforcement efforts to prevent the public from swimming during closed hours.⁶ The DPR uses its nationally recognized Parks Inspection Program to evaluate maintenance conditions of these facilities, and results are posted online. Although the Parks Department tracks the conditions of bathrooms and drinking fountains, they do not affect a beach's rating. Inspections of these features are only published on a citywide level.

NYC Department of Health and Mental Hygiene

According to the New York City health code, the Department of Health "is responsible for protecting the health and safety of beach users."⁷ The health code outlines the thresholds for water quality standards; guidelines for lifeguard supervision; and requirements for design, construction, maintenance and operations of bathing beach facilities. While the Department of Parks is largely responsible for carrying out these requirements and ensuring that beaches and facilities are operated according to DOH guidelines, the DOH reviews design plans and conducts inspections to ensure that the DPR is following the code.

NYC Department of Environmental Protection

The Department of Environmental Protection (DEP) is responsible for protecting the city's waterways for marine life and recreational use. Though the DEP monitors water quality at beaches year-round, the Enhanced Beach Protection Program, launched in 1997, provides increased surveillance of beach water quality during the summer months.⁸ The goal of the program is to reduce beach closures by quickly catching and addressing problems regarding water quality.

⁶ New York City Health Code, Article 167. Retrieved April 2006 from <http://www.nyc.gov/html/doh/downloads/pdf/public/167-notice.pdf>

⁷ Ibid.

⁸ Department of Environmental Protection. "City Launches 1998 Enhanced Beach Protection Program." 29 May 1998. Retrieved June 2006 from <http://home2.nyc.gov/html/dep/html/press/beachpr.html>.

and mainland Queens in the 1930s, which caused an increase in permanent, year-round residents. The Parks Department acquired the beach from the City by charter in 1938, along with Coney Island (Brooklyn) and South Beach (Staten Island).¹¹

In light of Hurricane Katrina and other recent storms, many coastal communities today are concerned with overdevelopment, and Rockaway residents are no exception. This fragile barrier island is a flood zone, making it extremely vulnerable to even a moderate hurricane. Despite this, the City is allowing the development of close to 4,000 new houses on the peninsula. In the event of an emergency, evacuation of the area would be extremely difficult, with only three points of access to and from the Rockaways.¹²

In its 2007 Needs Statement, Queens Community Board 14 states, “The decimation of the Parks Department and its personnel has had a particularly disastrous effect on its parks and beaches, and most importantly our community.” The group calls for an increase in staff, from lifeguards to maintenance personnel, assigned to Rockaway Beach. The board also notes the need for renovated restroom facilities and continuous maintenance of Rockaway Beach’s long boardwalk.¹³

Coney Island/Brighton Beach, Brooklyn

Coney Island and Brighton Beach stretch for 2.7 miles, from W. 37th Street to Corbin Place.¹⁴ These beaches face the Atlantic Ocean and are accessible by the B, D, F, and Q subway lines as well as several bus lines. Coney Island attracts more visitors than any other NYC beach, with 15.6 million in 2006.¹⁵

The area’s colorful history as a seaside resort and amusement park is legendary. By 1920, the subway connected Coney Island to the rest of the city, and its beach became an extremely popular destination. Beach improvements began in 1921, once the City secured the title to the beachfront, and included the construction of the boardwalk and the adding of sand. In 1938, Coney Island’s beach was transferred to the Parks Department, widened to serve more people, and extended to meet Brighton Beach in the east.

In recent years, Coney Island has experienced a veritable renaissance, as it has become host to the Mermaid Parade, the *Village Voice* music festival SirenFest, and a minor league baseball team, the Brooklyn Cyclones, at Keystone Park. Following the recent sale of 14 acres of boardwalk land to major developer Thor Equities, the surrounding communities are debating how the increased development will impact Coney Island’s future. The beach is the cornerstone for this growth, and increased visitors and revenues will amplify demand for clean and safe beaches.

In its Needs Statement, Brooklyn Community Board 13 states that although the Parks Department does everything possible to keep the beaches clean, “it is obvious to one and all that there simply is not enough staffing to do the job to A-I perfection.” Beach bays closed due to a lack of lifeguards and boardwalk trip hazards are among the most common calls received by the community board. An increase in Parks personnel is necessary to properly address trip hazards and debris on the beach. The board calls for additional shade pavilions and wheelchair access to the beach, due to the large number of elderly residents in the Coney Island/Brighton Beach community.¹⁶ The Parks Department recently introduced wheelchair accessible mats at several city beaches, including Brighton Beach, as a pilot program.

¹¹ DPR. “Rockaway Beach.” Retrieved March 2006 from http://www.nycgovparks.org/sub_your_park/historical_signs/hs_historical_sign.php?id=7719.

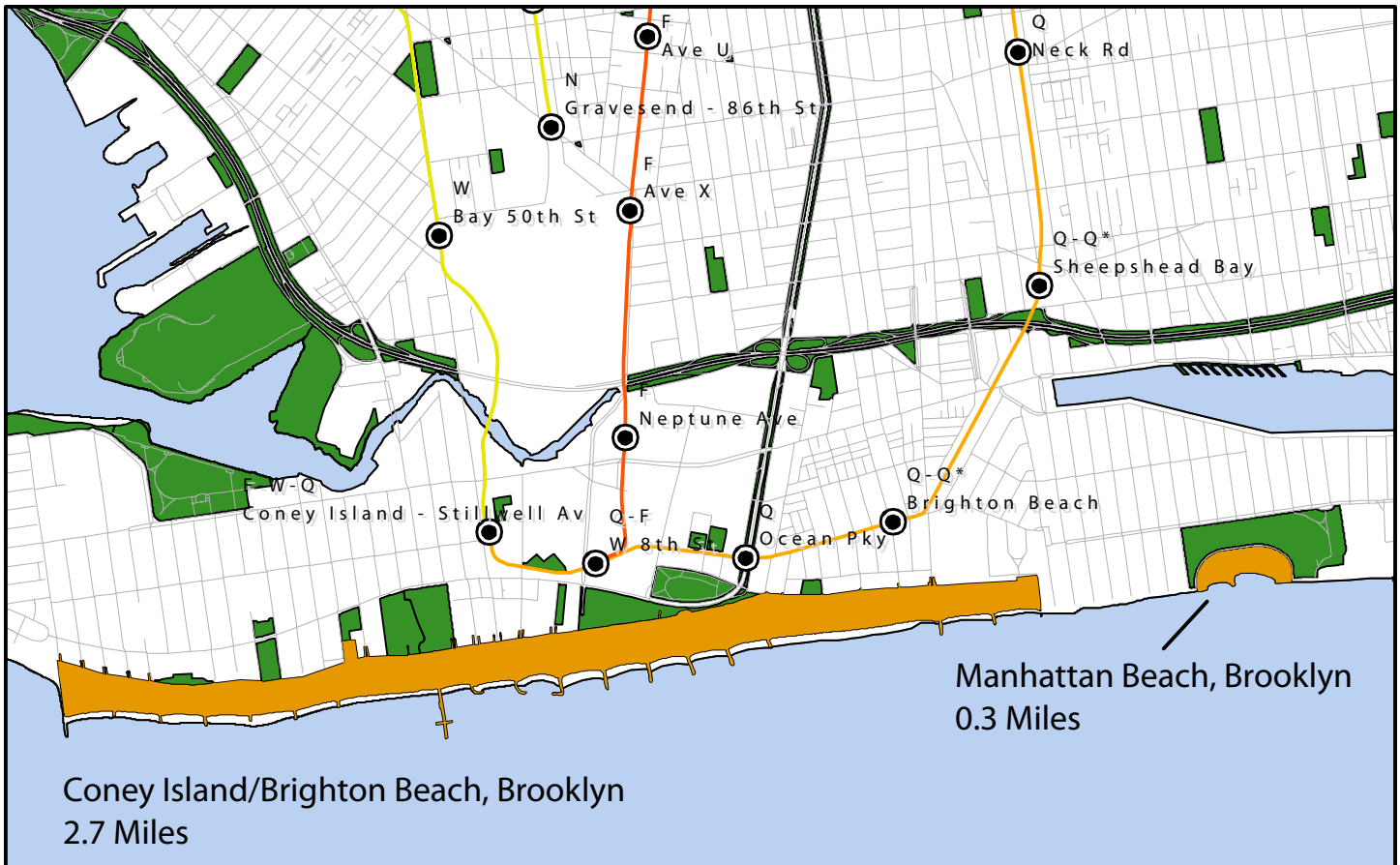
¹² Lisberg, Adam. “Could a ‘Cane Blow Away the Rockaways?” *New York Daily News*. 18 June 2006.

¹³ Community Board Needs Statements 2007. Queens Community Board 14. Department of City Planning and Office of Management and Budget, NYC.

¹⁴ DPR. “Coney Island Beach & Boardwalk.” Retrieved March 2006 from <http://gis.nyc.gov/parks/lc/NYCParkSearch.do?geocodeID=1>.

¹⁵ Department of Parks and Recreation testimony, City Council Oversight Hearing on “Managing the Erosion of City Beach Properties,” held by the Committee on Waterfronts. 16 Jan 2007.

¹⁶ Community Board Needs Statements 2007. Brooklyn Community Board 13. Department of City Planning and Office of Management and Budget, NYC.



Manhattan Beach, Brooklyn

Manhattan Beach is between Ocean Avenue and Norfolk Street, east of Brighton Beach on the Atlantic Ocean. Created on a salt marsh by a real estate developer in the mid-19th century, Manhattan Beach was transferred to the City Parks Department in 1951. Today, it primarily serves the small residential communities of Manhattan Beach and Sheepshhead Bay and offers a quieter alternative to Coney Island. The closest subway stop to Manhattan Beach is the Brighton Beach stop on the Q train, which is approximately a one-mile walk from the site. The U-shaped beach is approximately .3 mile long and had 1 million visitors in 2006.¹⁷ A playground and several baseball fields add to the recreation opportunities in the area.¹⁸

In its Needs Statement, Brooklyn Community Board 15 focuses primarily on staffing issues at Manhattan Beach. The neighborhood is particularly concerned with the need for more stringent enforcement of Parks rules, which would require additional Park Enforcement Patrol (PEP) officers to be assigned to this beach. The community board states, “Repairs to the promenade and guard-rail along the promenade area, as well as the basketball courts, are needed” in the vicinity of the beach.¹⁹

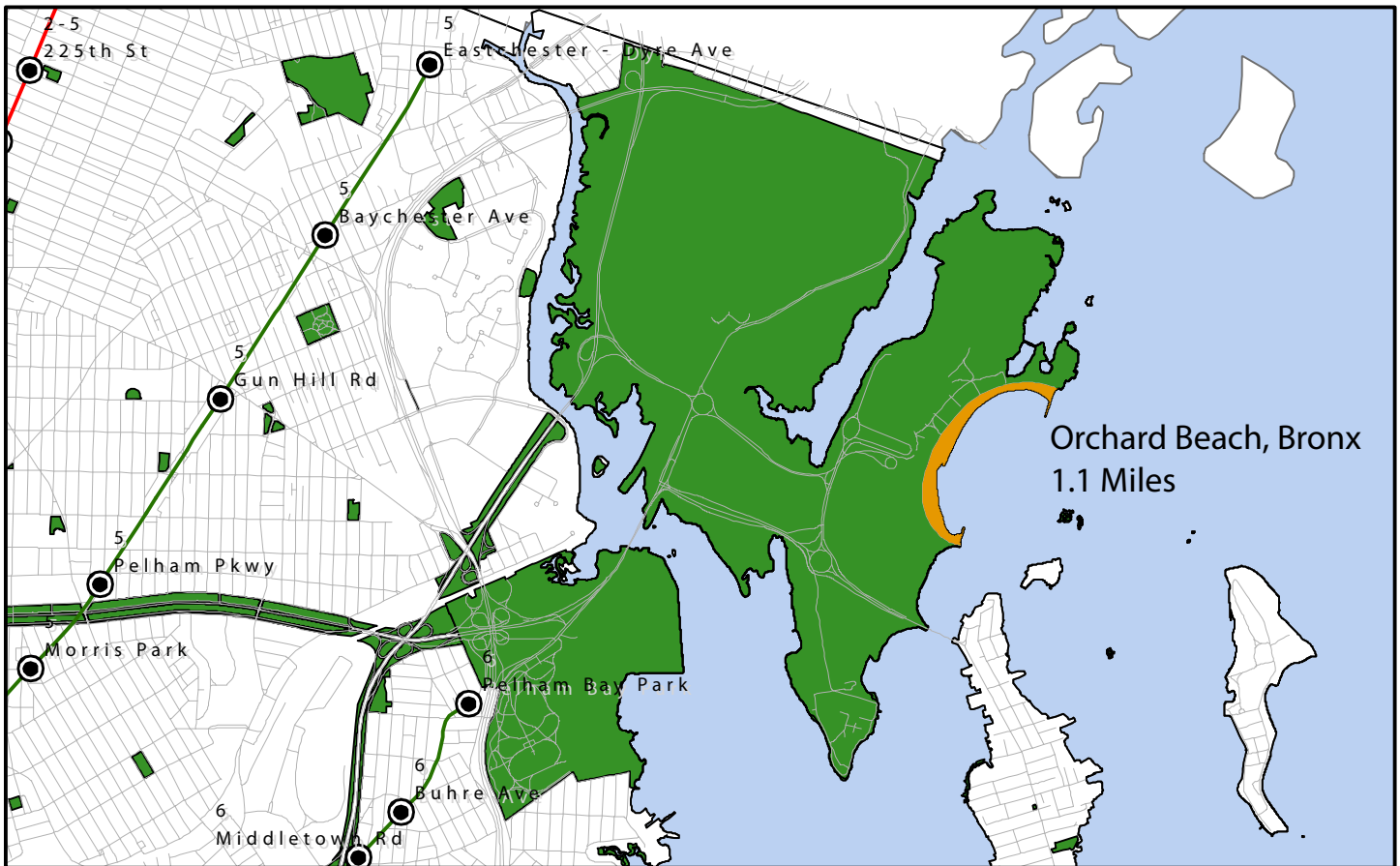
¹⁷ Department of Parks and Recreation testimony, City Council Oversight Hearing on “Managing the Erosion of City Beach Properties,” held by the Committee on Waterfronts. 16 Jan 2007.

¹⁸ DPR. “Manhattan Beach Park.” Retrieved March 2006 from <http://gis.nyc.gov/parks/lc/NYCParkSearch.do>.

¹⁹ Community Board Needs Statements 2007. Brooklyn Community Board 15. Department of City Planning and Office of Management and Budget, NYC.

Orchard Beach, Bronx²⁰

The Bronx Riviera, as Orchard Beach has come to be known, is one of the most popular summer spots for residents of the Bronx and Manhattan. In 2006, an estimated 1.6 million people visited this beach.²¹ Part of Pelham Bay Park, Orchard Beach was created under the orders of Robert Moses, who connected Rodman’s Neck and Hunter Island with landfill and trucked in sand to build the beach on Pelham Bay. The site officially opened to the public in 1936 but was not fully completed until 1947, when the water between Hunter and Twin islands was filled in.²² Today, the beach is 1.1 miles long and offers a large parking lot for drivers. It is reachable by taking the No. 6 train to the end of the line and transferring to a city bus.



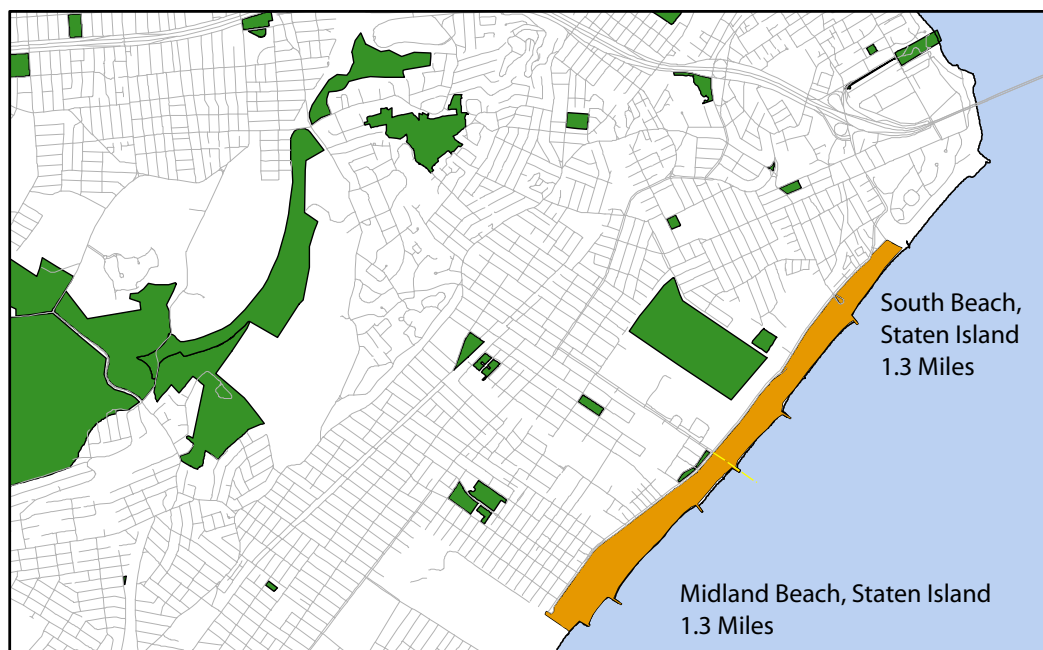
²⁰ Bronx Community Board 10, which includes Orchard Beach, does not discuss priorities for parks or the beach. The 2007 Needs Statement for Bronx CB 10 discusses only the need for additional police officers in the district.

²¹ Department of Parks and Recreation testimony, City Council Oversight Hearing on “Managing the Erosion of City Beach Properties,” held by the Committee on Waterfronts. 16 Jan 2007.

²² DPR. “Orchard Beach.” Retrieved March 2006 from http://www.nycgovparks.org/sub_your_park/historical_signs/hs_historical_sign.php?id=12110.

South Beach and Midland Beach, Staten Island

South Beach stretches from Fort Wadsworth to Seaview Avenue, and Midland Beach begins at Seaview Avenue and continues south to Miller Field in Staten Island. Fort Wadsworth and Miller Field are both part of the federal Gateway National Recreation Area. The beaches are on the Lower New York Bay and together stretch for approximately three miles. There are a few Staten Island Railroad stations near the beach (not pictured), but the walking distance from these stops is quite far.



In the late 19th and early 20th centuries, these beach communities resembled Coney Island, with hotels, amusement parks, and casinos. In the late 1920s, the Depression, as well as fires and polluted water, caused a sharp decline in beach visitors. The Franklin D. Roosevelt Boardwalk was constructed in 1935 by the Works Progress Administration (WPA) and named after the program's founder. The fourth longest in the world, the 2.5-mile-long boardwalk spans South and Midland beaches.²³ In 2006, nearly 300,000 visitors spent time at the two beaches.²⁴

In its 2007 Needs Statement, Staten Island Community Board 2 thanks the borough president for his support and funding for South Beach and Midland Beach, noting that this has led to increased beach visitors.²⁵

²³ DPR. "FDR Boardwalk and Beach." Retrieved May 2006 from

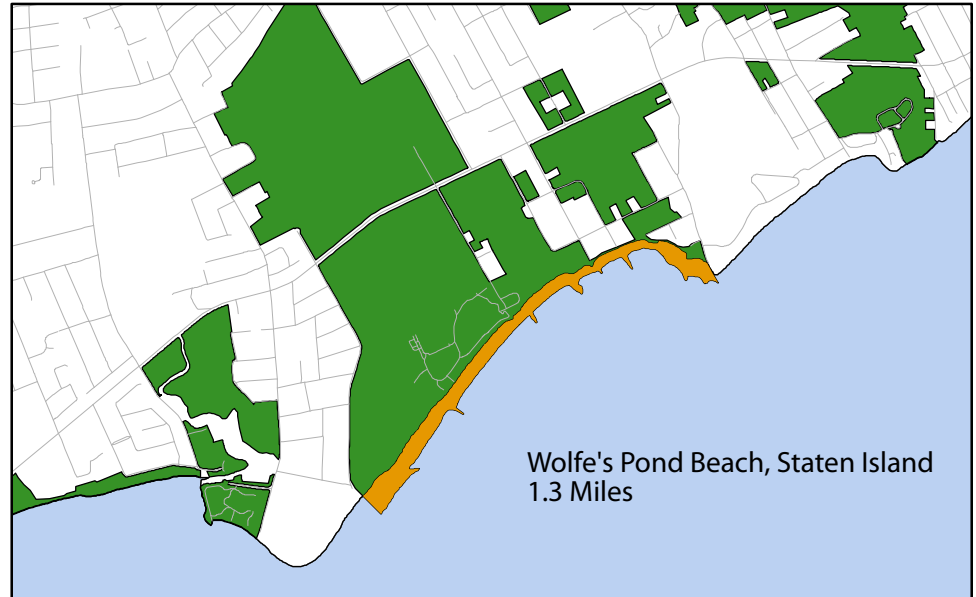
http://nycgovparks.org/sub_your_park/historical_signs/hs_historical_sign.php?id=12129.

²⁴ Department of Parks and Recreation testimony, City Council Oversight Hearing on "Managing the Erosion of City Beach Properties," held by the Committee on Waterfronts. 16 Jan 2007.

²⁵ Community Board Needs Statements 2007. Staten Island Community Board 2. Department of City Planning and Office of Management and Budget, NYC.

Wolfe's Pond Beach, Staten Island

Wolfe's Pond Beach is part of the park of the same name on the south-eastern coast of Staten Island on the Raritan Bay. The City acquired the land for this park in 1929 and undertook substantial projects to improve the park in 1933. A playground and other facilities were built, along with stairs leading to the beach. During the summer of 2006, approximately 50,000 people visited Wolfe's Pond Beach.²⁶ There is a small parking lot at the site, and the park is also accessible from the Staten Island Railroad Prince's Bay station stop; however, it is a significant walk from the station through the park to get to the beach.



In its Community Needs Statement, Staten Island Community Board 3 calls for the Parks Department to build comfort stations and an additional entrance to the park to ensure safe access, noting that the site has become increasingly popular in recent years.²⁷

Federal Beaches

The U.S. National Parks Service operates several miles of waterfront parkland in New York and New Jersey, which constitute the Gateway National Recreation Area (GNRA). The GNRA, created in 1974, comprises three units: Jamaica Bay, Staten Island, and Sandy Hook, NJ. Waterfront properties in these areas became national parkland in part due to the City's fiscal crisis of the 1970s. This was the federal government's first attempt at creating a large urban park, and to develop it, New York City transferred 17,000 acres of land to the federal government, while New Jersey transferred approximately 3,000 acres.²⁸

The NYC beaches in the GNRA include Jacob Riis Park and Breezy Point, which border Rockaway Beach in Queens, and Great Kills Park on the Lower New York Bay in Staten Island.

Gateway National Recreation Area sites are open year-round from sunrise to sunset and typically have extended hours in the summer.²⁹ Lifeguards are posted at these sites from Memorial Day to Labor Day from 10 a.m. to 6 p.m.

²⁶ Department of Parks and Recreation testimony, City Council Oversight Hearing on "Managing the Erosion of City Beach Properties," held by the Committee on Waterfronts. 16 Jan 2007.

²⁷ Community Board Needs Statements 2007. Staten Island Community Board 3. Department of City Planning and Office of Management and Budget, NYC.

²⁸ NYC Department of City Planning. Editor: Bethami Probst. "The New York City Waterfront: Comprehensive Planning Workshop." June 1974.

²⁹ NPS. "Gateway National Recreation Area." Retrieved May 2006 from <http://www.nps.gov/gate/pphtml/planyourvisit.html>.

5. LIFEGUARDS AND STAFFING

Recommendations:

1. Improve recruitment by administering training where there is demand and enhancing the transparency of testing.
2. Double the salary for lifeguards at underserved beaches as a pilot program.
3. Expand youth swimming opportunities in partnership with the Department of Education (DOE).

The Parks Department has historically faced a challenge in recruiting enough lifeguards to staff the city's beaches and pools, resulting in sections of the beach closed to swimmers. Community members have been vocal in expressing their frustration with this situation. This section will review the lifeguard program in terms of eligibility requirements and strategies for recruitment.

Qualifications, Salary, and Training

The NYC health code lays out the requirements for staffing levels and lifesaving equipment that must be present at open beaches. The Parks Department hires lifeguards to serve at beaches from the Saturday before Memorial Day in May until Labor Day in September. Lifeguards are assigned to Parks Department pools once they open in late June, coinciding with the end of the public school year. Historically, pools have not suffered from a shortage of lifeguards. Requirements to become a pool lifeguard are not as stringent as those necessary to lifeguard at beaches, so presumably there are more qualified applicants for positions at pools.

According to the NYC health code, which is dictated by the state, at least one lifeguard must be present for every 50 yards of beachfront, and certain conditions, such as dangerous currents or an excessive number of bathers, require additional lifeguards. When sufficient staffing is not available, the affected portions of the beach must be closed with clear signage stating so.³⁰

There are four lifeguarding positions that reflect varying levels of expertise and training.³¹ The type of water body (such as pool, ocean, or non-surf) and amount of usage necessitate different staffing levels, as mandated by the Department of Health.

If the Parks Department met its recruitment goals, lifeguards would be on duty at every section of a bathing beach between 10 a.m. and 6 p.m., seven days a week during the summer. A lifeguard works 48 hours each week. The starting salary in 2007 for both beach and pool lifeguards was \$11.72 per hour – a raise over the previous year's salary of \$10.71 per hour.³² Returning staff members are awarded a salary increase.

In order for the DPR to meet its recruitment goals, lifeguard salaries must be competitive. Private pools and clubs pay significantly more than public facilities, but even neighboring public beaches pay higher salaries than NYC. Jones Beach, in Nassau County, NY, operated by the state, pays entry-level lifeguards \$12.56 an hour – nearly a dollar more than the starting salary for NYC beach and pool lifeguards.³³

The requirements to become a lifeguard are detailed in the NYC health code. Lifeguard applicants must be at least 16 years old, meet certain vision requirements, and take a qualifying exam, administered between January and April at the 59th Street Recreation Center in Manhattan. During the exam, applicants are required to swim 50 yards in 35 seconds. Those who pass are enrolled in the Municipal Lifeguard Training Program, a 40-hour course.³⁴

³⁰ New York City Health Code, Article 167. Retrieved April 2006 from <http://www.nyc.gov/html/doh/downloads/pdf/public/167-notice.pdf>.

³¹ Ibid.

³² DPR, Permits and Applications, "Lifeguards Wanted!" Retrieved January 2007 from http://www.nycgovparks.org/sub_permits_and_applications/lifeguard_info.html

³³ Personal correspondence. Ron Harris. Lifeguard Coordinator's Office, Jones Beach. 4 Aug 2006.

³⁴ DPR, Permits and Applications, "Lifeguards Wanted!" Retrieved January 2007 from http://www.nycgovparks.org/sub_permits_and_applications/lifeguard_info.html

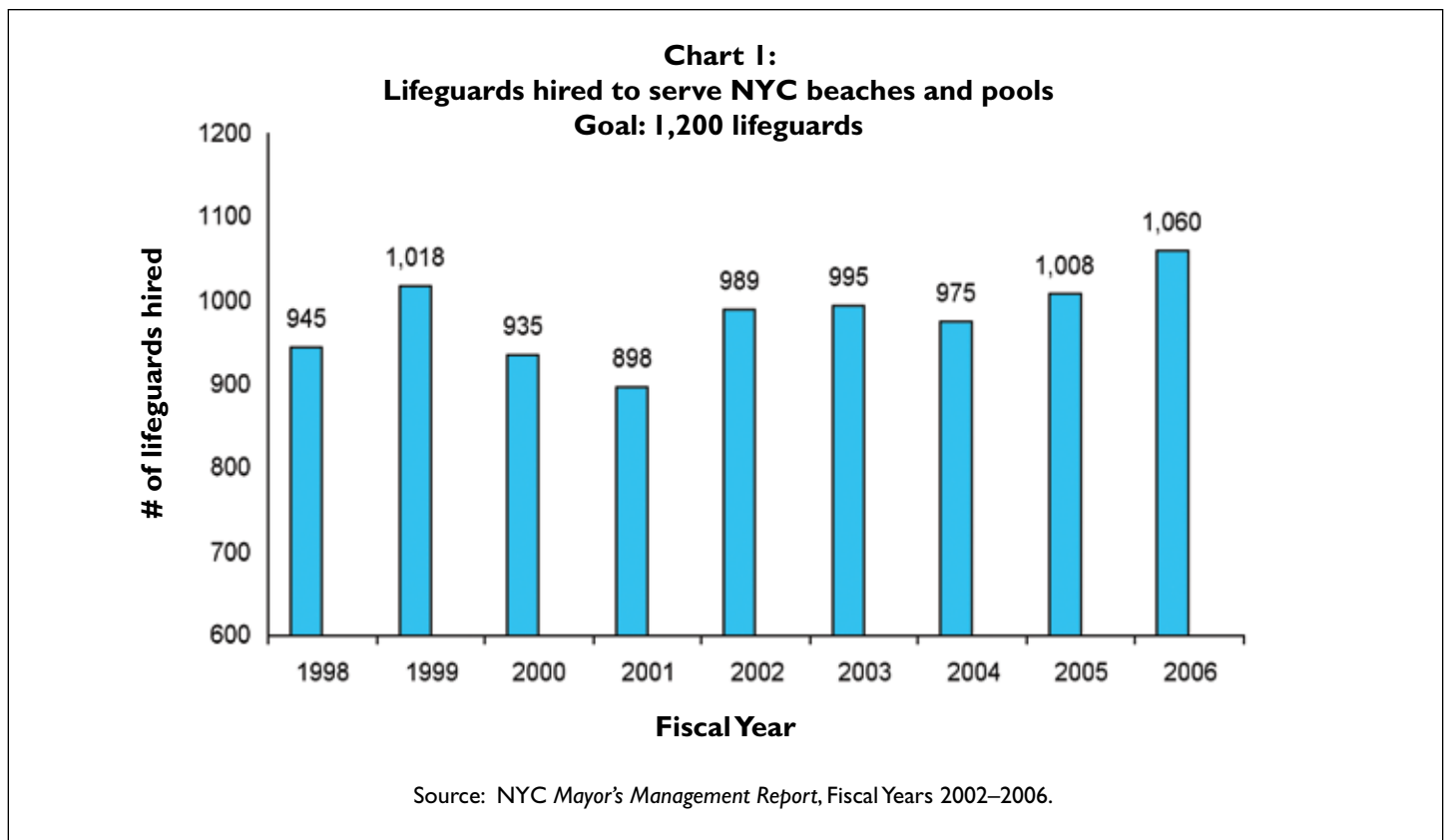
The Municipal Lifeguard Training Program, or Lifeguard School, takes place at Manhattan’s 59th Street Recreation Center. Classes are typically about two and a half hours each, spread over 16 weeks. This can pose a significant barrier to applicants living outside Manhattan and particularly those living on the shore, who face extremely long commutes of over an hour by public transportation. The Parks Department has recently begun to offer training in the outer boroughs, which is an important step. Training should be offered wherever there is sufficient demand.

Those who attend the training learn several swimming strokes, lifesaving methods, and CPR. At the end of the course, applicants must pass a written exam and a second, more challenging swimming test, with tougher requirements for beach lifeguards than for pool lifeguards. Those who pass the tests are guaranteed employment as NYC lifeguards.

Rockaway residents in particular have voiced concern that the lifeguard testing process is in need of increased transparency, based on several issues.³⁵ Overseen by the lifeguard’s union and conducted behind closed doors, parents and swim coaches are not allowed inside the testing room. In addition, handheld stopwatches rather than posted clocks are used to record swim speed, and applicants are not given their times – they are simply told whether they have passed or failed.³⁶ The testing process must be fully transparent in order to be successful.

Recruitment – An Ongoing Challenge

In order to fully staff the city’s public beaches and pools, the Parks Department must recruit 1,200 lifeguards. However, since 1998, when lifeguard recruitment numbers were first made available in the *Mayor’s Management Report*, this goal has never been met, resulting in closed beaches.³⁷ In fiscal year 2006, the department reached a high of 1,060 lifeguards. Although this represents some success, it is still 140 employees short of their goal.³⁸ (See Chart 1).



³⁵ Magoolaghan, Brian. “Outrage Over ‘Failed’ Lifeguard Program.” *The Wave*. 21 Jul 2006.

³⁶ *Ibid.*

³⁷ City of New York, Mayor’s Office of Operations, *Mayor’s Management Report*, FY 2002–2006.

³⁸ *Ibid.*

During the summer of 2005, long stretches of Coney Island – the city’s most popular beach – were closed for several weeks due to a lack of lifeguards. The department’s goal that summer was to have 90% of the beachfront open and available during the weekends and 75% during the week, but that goal was not always met.³⁹ Residents of the Rockaway community have also been forced to adjust to summers without consistent beach access due to insufficient staffing.⁴⁰

The challenges of hiring sufficient summer staff are not unique to NYC. These challenges have been faced across the country, and the standard explanation has been that there are fewer qualified swimmers and different job preferences among high school and college students, historically the most common lifeguard demographic.⁴¹ In addition, hard-to-reach testing and training sites, as well as the relatively low salary, which results from union bargaining, have been blamed for NYC’s shortage.⁴² As discussed previously, some beach community members believe that the training process discourages some candidates and that more transparency would improve recruitment efforts.



Unfortunately, the lifeguard shortage results in sections of closed beaches, inaccessible to the public during the hot summer months.

To battle the shortage, the Parks Department has worked to increase the visibility and marketing of the lifeguard program. During the winter and spring of 2007, the Parks Department installed lifeguard chairs at six sites across the five boroughs to inspire potential lifeguards to think about summer positions. The department partnered with NYC & Company, the city’s tourism arm, to improve the marketing of the program.⁴³

The Parks Department has also marketed the lifeguard program overseas to increase the pool of applicants. Though this is an innovative strategy, it results in only a small percentage of international staff. In fiscal year 2002, out of nearly 1,000 lifeguards, the department hired 40 from other countries.⁴⁴ (These are the most recent published numbers on international lifeguard staff.)

Swimming Programs: DPR, DOE, and Nonprofits

Public officials frequently state that there are not enough qualified swimmers in NYC to sufficiently staff beaches and pools, and recent studies have identified financial barriers and a cultural divide in learning to swim.⁴⁵ According to the Centers for Disease Control and Prevention (CDC), African-American children between the ages of 10 and 14 are five times more likely to drown than whites in the same age group. The typically high cost of swimming lessons has added to the disparity.⁴⁶ In order to bridge this gap in swimming skills, address the safety concerns that it raises, and produce a new

³⁹ Mooney, Jake. "Coney Island Suffering From Lifeguard Shortage." *The New York Times*. 9 Aug 2005.

⁴⁰ Personal interview. Jeanne Dupont, Rockaway Waterfront Alliance. 13 Apr 2006.

⁴¹ Schwartz, Anne. "Not a Swimmer's Paradise." *Gotham Gazette*. 1 Jun 2002.

⁴² Zimmer, Amy. "The City's Life Aquatic." *Metro*. 5 July 2006.

⁴³ DPR. "12-Time Olympic Medalist and Swimmer Jenny Thompson Joins Parks Commissioner and Borough Presidents to Launch Lifeguard Recruitment." Media advisory, 13 Mar 2006.

Retrieved May 2006 from http://www.nycgovparks.org/sub_newsroom/media_advisories/media_advisories.php?id=19754.

⁴⁴ City of New York, Mayor's Office of Operations, *Mayor's Management Report*, FY 2002.

⁴⁵ Zinser, Lynn. "Everyone Into the Water." *New York Times*. 19 Jun 2006.

⁴⁶ Ibid.

generation of swimmers, several organizations, including the DPR, have stepped up to offer free swimming programs.

The Parks Department, in partnership with the Department of Education, launched a pilot program in 2005 in elementary schools called Swim to Safety, which teaches water safety and swimming skills during the school day. This important program successfully removes many of the obstacles, such as transportation issues, that may prevent families from accessing after-school swim programs. More than 2,000 second-graders participated in Swim to Safety in its first year. This model has been very successful in helping young children get comfortable in the water.

The DPR's ability to expand Swim to Safety and serve more youth is dependent upon partnering opportunities with the YMCA and similar organizations that have pool facilities. In 2006, three YMCA pools and nine DPR recreation centers hosted the program. By using the YMCA sites, the DPR is able to reach populations with high rates of obesity, diabetes and other health issues. These populations could greatly benefit from the exercise that swimming offers.⁴⁷

In addition, the Parks Department's free Learn to Swim program offers classes for toddlers (ages 3 to 5) and children (ages 6 to 14) after school in the spring at nine pools in all five boroughs. During the summer, Learn to Swim sessions are held at a variety of pools citywide.⁴⁸ In 2001, almost 6,000 kids participated in the summer Learn to Swim program, and 2,000 took classes at indoor pools during the school year.⁴⁹ After graduating from Learn to Swim, youth ages 6 to 18 are invited to join the Parks Department's summer swim team, where they receive further training and participate in swim meets.

The NYC chapter of the Surfrider Foundation has launched a program called Respect the Beach in the Rockaways, in which they tackle the socioeconomic divide by teaching urban children about beach ecology and safety, in order to make them more comfortable in the environment.⁵⁰ On the Upper East Side, Asphalt Green, a sports and training facility, hosts a free swimming program for second-graders with the goal of increasing diversity in the sport.⁵¹

In 2005, the DOE funded and developed, with the assistance of Rockaway community members, an extremely successful local swim program to provide teenagers in the neighborhood with the lifesaving skills necessary to become lifeguards. The swimming program takes place from November to May at the two area high schools that are equipped with pools – Far Rockaway and John Adams. The classes have an open-door policy, allowing kids to attend as they are able. Experienced lifeguards are on hand to teach and guide the lessons.⁵²

According to the DPR, 60 graduates of the Rockaway's Department of Education program applied and passed the initial lifeguard test in 2006.⁵³ However, when it came time to attend the Municipal Lifeguard Training Program (or Lifeguard School) in Manhattan, many of the teens were discouraged by the lengthy commute. (Since then, the department has worked to offer training at some locations in the outer boroughs.) Several went to work for the federal beach at Jacob Riis Park in the Rockaways, which requires only three hours of training for qualified applicants.⁵⁴

⁴⁷ Personal correspondence. Jane Rudolph-Woods, chief of staff to the commissioner, DPR. 15 Aug 2006.

⁴⁸ DPR. "Learn to Swim." Retrieved May 2006 from http://www.nycgovparks.org/sub_things_to_do/programs/ap_learn_to_swim.html.

⁴⁹ Schwartz, Anne. "Not a Swimmer's Paradise." *Gotham Gazette*. 1 Jun 2002.

⁵⁰ Personal interview. Joel Banslaben, chair, Surfrider Foundation NYC. 27 Apr 2006.

⁵¹ Zinser, Lynn. "Everyone Into the Water." *New York Times*. 19 Jun 2006.

⁵² Personal interview. Jeanne Dupont, Rockaway Waterfront Alliance. 13 Apr 2006.

⁵³ Department of Parks and Recreation testimony, City Council hearing on the Parks Department FY 2007 Executive Budget. 6 Jun 2006.

⁵⁴ Personal interview. Hank Iori, volunteer site supervisor for the Rockaway swim program. 1 Sept 2006.

Following the completion of Lifeguard School, the teens were sent to the lifeguard testing site, the final step in determining if and where the applicant would be placed. Subsequently, the community voiced concern that increased transparency is needed in the testing process.⁵⁵ In particular, clocks should be posted on the wall to publicly announce swim times, and an adult should be allowed in the testing room with the candidate. Once these issues are addressed, this valuable program should be expanded to other schools across the city, particularly in beach communities.

Council member Oliver Koppell has highlighted in recent City Council hearings the fact that there are pools in high schools throughout the city that are closed and unavailable for use.⁵⁶ There are two such instances in his district, which is in the northwest Bronx and includes Riverdale, Norwood, and Kingsbridge. By undertaking the improvements necessary to open these pools, the Department of Education would be taking a vital step toward recognizing the importance of teaching NYC youth to become swimmers. The department should also consider incorporating swimming more fully into the high school curriculum.

Other Beach Staff

Aside from lifeguards, beaches are also staffed with beach operators, Park Enforcement Patrol (PEP) officers, and maintenance workers. Beach operators act as the general managers, responsible for hiring personnel and ensuring general safety and cleanliness. PEP officers are responsible for addressing security and safety concerns, and their duties include confiscating illegal concessions and preventing the public from entering closed beaches when lifeguards are not on duty.⁵⁷

Currently, PEP officers stationed at beaches do not receive special training on water safety or lifesaving. The Rockaway Waterfront Alliance believes that if PEP officers are posted at the beach, they should receive this training so that they might assist in an emergency.⁵⁸

During the summer, PEP officers are frequently removed from neighborhood parks and deployed at beaches instead, leaving parks underserved. The fiscal year 2007 Parks Department budget included \$1 million in new funding for PEP, which would presumably allow for more complete coverage of park properties. If beaches were fully staffed with lifeguards, PEP officers would not need to be posted at closed beaches and could be deployed at busy neighborhood parks instead.

Recommendations

1. Improve recruitment by administering training where there is demand and enhancing the transparency of testing.

In order to boost lifeguard recruitment and retention in the outer boroughs, where all seven city beaches are located, the Parks Department should offer the Municipal Lifeguard Training Program in these communities, where there is sufficient demand. Applicants who passed the initial swim test could be more likely to pursue employment as a lifeguard if they are able to avoid the lengthy commute to training in Manhattan.

Alternatively, the Parks Department should begin to accept lifesaving certification from other organizations, such as the Red Cross. Currently, every applicant must attend the 16-week Municipal Lifeguard Training Program. If applicants were able to take classes through the YMCA aquatics program or the U.S. Lifesaving Association, which may offer courses in their neighborhood, they may be more likely to pursue a lifeguard position. The Parks Department should partner with such nonprofits to offer a discounted or subsidized rate for lifeguard applicants. This could improve the retention of lifeguard applicants from the outer boroughs as they move through the training and testing process.

⁵⁵ Magoolaghan, Brian. "Outrage Over 'Failed' Lifeguard Program." *The Wave*. 21 Jul 2006.

⁵⁶ Council member Oliver Koppell, City Council hearing on the Parks Department FY 2008 Executive Budget Hearing. 17 May 2007.

⁵⁷ New York City Health Code, Article 167. Retrieved April 2006 from <http://www.nyc.gov/html/doh/downloads/pdf/public/167-notice.pdf>.

⁵⁸ Personal interview. Jeanne Dupont, Rockaway Waterfront Alliance. 13 Apr 2006.

Once lifeguard applicants have completed the necessary training, they should be guaranteed an open and fair testing process. The testing room should contain posted clocks, and a parent or swim coach should be allowed in the room with the young adult who is trying out. These improvements would provide additional transparency and prevent disputes.

2. Double the salary for lifeguards at underserved beaches as a pilot program.

In order for the DPR to meet its recruitment goals, lifeguard salaries must be competitive. Nearby public beaches offer up to a dollar more per hour for lifeguards, and private pools offer significantly more than that. The department should consider launching a pilot program to double the lifeguard salary at beaches that are particularly hard to serve, such as Rockaway Beach. This would help determine the effect that pay has on recruitment efforts and would result in fewer closed sections of the beach.

3. Expand youth swimming opportunities in partnership with the Department of Education.

Free swimming programs tackle a variety of important issues. They provide city children with the skills to protect themselves in the water, and they help to bridge the gap so that all children regardless of income can enjoy a safe swimming experience. In addition, introducing kids to the water early on could motivate them to continue with the sport and eventually become interested in the lifeguard program.

The Department of Education and the Parks Department should expand the successful lifeguard training program that has been set up in the Rockaways at other schools across the city, particularly those in beach communities. Although the program has faced some challenges, it provides free training for teenagers and has resulted in new lifeguard applicants. The Department of Education should also offer credit for swimming class in high schools to encourage a new generation of swimmers.

Potential opportunities to expand swimming facilities should be pursued. There are high schools throughout the city that have pools that are closed and not being used, including two neighboring schools in the Kingsbridge and Norwood areas of the Bronx. The Department of Education has an obligation to undertake the capital or staffing initiatives necessary to open these pools and use them as a resource so that children may learn or improve their swimming skills.

6. MAINTENANCE AND INSPECTIONS

Recommendations:

1. Implement “Operation Relief” for beach bathrooms in order to improve maintenance and reduce violations.
2. Increase the transparency of Parks Inspection Program (PIP) results and include bathrooms and drinking fountains in a beach’s rating.

In 2004, the Parks Department spent \$2.2 million, out of its \$148 million maintenance and operations budget, on beach upkeep. This includes maintenance of facilities, such as bathrooms. Staff is increased during the busy summer season so that beaches can be cleaned and shorelines inspected on a daily basis. Maintenance staff uses rakes to clean shorelines, and a power wagon removes excess debris. Night crews clean the beach every evening from Friday to Tuesday, which are the days that see the heaviest use.⁵⁹

In a 2006 online survey on beach use conducted by New Yorkers for Parks and Baruch College’s eTown Panel, New Yorkers were more likely than nationwide respondents to report that their local beach is “crowded,” “noisy,” “dirty,” “unsafe,” or “closed.” New Yorkers also rated “bathing water quality,” “drinking fountains,” and “bathrooms” lower than their nationwide counterparts.

Despite the increased care of beaches during the open season, public opinion, as well as the frequency of inspection violations, is evidence that the department needs more staffing and funding to be able to consistently uphold the standards of public health and safety.

Health Department Inspections

The Health Department inspects all DPR beach facilities – including bathrooms, showers, and first aid stations – to ensure that they are sufficiently maintained according to the standards set in the city’s health code. Inspections take place once at the beginning of the summer. To conduct the inspections, larger beaches are divided into distinct sections. If inspectors note any violations, that particular section of the beach is inspected again one month later; otherwise, only one inspection takes place at the start of the season.⁶⁰

There are two categories of violations: “public health hazard” and “general.” Public health hazard violations, such as an open beach with an insufficient number of lifeguards, pose an immediate and serious threat to safety. These violations must be addressed immediately. General violations include the failure to provide sufficient drinking water fountains and the failure to properly maintain building structures. During the summer of 2006, the Health Department conducted 46 total inspections of public beaches. The Health Department and Parks Department work together to address violations.⁶¹



Beach users should be able to rely on clean bathrooms that are open during the daytime, unlike this men’s room at Coney Island.

⁵⁹ Personal e-mail, Dana Rubinstein, Parks Dept spokesperson. 21 Oct 2004.

⁶⁰ Personal interview. Angela Ward, Office of Public Health Engineering, DOHMH. 6 Apr 2006.

⁶¹ Ibid.

Historical and current inspection data are published on the Health Department's website so that the public is able to identify violations received by a beach. Each beach property is listed along with a link to every inspection that took place over the course of that summer. Additionally, at the end of the summer, the Health Department is required to issue and post a comprehensive report detailing the dates and results of all inspections.⁶² Table I, below, provides compiled data on the violations that each beach received during the summer of 2006.

**Table I:
Public beach violations documented in summer 2006 by the Department of Health,
Bureau of Public Health Engineering^{63*}**

BEACH	PUBLIC HEALTH HAZARD	GENERAL VIOLATIONS								TOTAL # VIOLATIONS
		Failure to provide adequate lighting and/or ventilation	Failure to properly maintain and operate in a safe, clean, and sanitary condition	Failure to properly maintain the building structure free of cracks or open joints on the walls or floors	Failure to provide liquid soap, paper towels, or electric hand dryer	Failure to provide covered waste receptacle	Failure to provide drinking water fountain or use of an unapproved or contaminated water supply source for potable water use	Failure to provide adequate toilet and shower facilities	Failure to provide 50 feet of hosing with vacuum breaker to flush the bathhouse	
Rockaway Beach		4	2	2	4	8	2	1	1	24
Coney Island/Brighton Beach	3	2	2		4	6	3			20
Manhattan Beach						1			2	3
Orchard Beach										0
Midland Beach	1		2	1	2					6
South Beach	1				1					2
Wolfe's Pond Park Beach			1	2	1					4
Total	5	6	7	5	12	15	5	1	3	59

*The number of violations that a beach receives is somewhat dependent on the size of the beach. For example, Coney Island/Brighton Beach is divided into six sections, and Rockaway Beach is divided into eight sections for inspection purposes, so the potential number of violations is higher for these properties. The remaining five beaches are not divided into sections, and instead each is evaluated as one area.

In addition, only those violations that were cited are included in this chart. Beaches were inspected on other measures that are not included here. The full data is available in DOHMH's Bureau of Public Health Engineering report, "2006 NYC Beach Surveillance and Monitoring Program Summary."

⁶² Int. No 462-A. City Council of New York. Retrieved April 2006 from <http://webdocs.nycouncil.info/textfiles/Int%200462-2004.htm?CFID=154878&CFTOKEN=36746839>.

⁶³ Bureau of Public Health Engineering, NYC Department of Health and Mental Hygiene. "2006 NYC Beach Surveillance and Monitoring Program Summary." Oct 2006.

Orchard Beach received no violations during the summer of 2006.⁶⁴ This represents a great success for the DPR. Another tremendous success is the relatively small number of public health hazard violations issued by the Health Department. Only five of these violations were given out in the summer of 2006, versus 38 in the summer of 2005.⁶⁵

However, despite regular inspections by the Health Department, the DPR has struggled to provide sufficient services at most city beaches, resulting in a string of general violations throughout the summer.⁶⁶ During the summer of 2006, four public beaches suffered at least once from the following general violation: “Failure to properly maintain and operate in a safe, clean and sanitary condition.” This violation generally refers to beach bathrooms. Every public beach except for Orchard and Manhattan received at least one general violation for failing to “provide liquid soap, paper towels or electric hand dryer” in restrooms. The most commonly occurring violation was “failure to provide a covered waste receptacle.”⁶⁷

The Parks Department developed and implemented a successful strategy to improve the conditions of bathrooms throughout parks in NYC. This targeted maintenance effort, called Operation Relief, should be implemented for beach bathrooms to improve performance. This already existing program could assist in curtailing the violations given to public beach bathrooms.

Parks Department Inspections

Through the Parks Inspection Program (PIP), the Parks Department conducts its own evaluations of park properties, including beaches. The inspections serve as a management tool for the DPR, versus the health inspections, which are meant to ensure that public health and safety standards are met. Legislation passed by the City Council in 2005 requires the DPR to post PIP ratings on its website. Water-quality inspection results must be made available at the beaches themselves, as well as on the Department of Health website.⁶⁸

PIP results are difficult to access, with only the most ambitious beachgoers able to find information. A general search on the DPR website by park or beach name will eventually link to inspection data, but there is no straightforward way to access these results.

Aside from being obscurely located on the DPR website, beach users may find the level of detail in the PIP inspections disappointing. The results fail to include many of the details that are important to beach users. For example, like the PIP inspection results for any park property, conditions of bathrooms and drinking fountains do not impact an individual beach’s rating and are posted only at the citywide level. The DPR should include these important features in PIP results.

The Health Department issues an annual report on the results of its beach inspections, and the DEP regularly issues a report on harbor water quality. These important publications educate beach users, allowing them to make informed decisions regarding beach visits, as well as advocate for improved services. The Parks Department should work to make citywide information on beach conditions more readily available to users.

⁶⁴ Bureau of Public Health Engineering, NYC Department of Health and Mental Hygiene. “Beach Inspection Results.” Retrieved January 2007 from <http://www.nyc.gov/html/doh/html/beach/beach-inspection.shtml>.

⁶⁵ Bureau of Public Health Engineering, NYC Department of Health and Mental Hygiene. “2005 NYC Beach Surveillance and Monitoring Program Summary.” Oct 2005.

⁶⁶ Bureau of Public Health Engineering, NYC Department of Health and Mental Hygiene. “2006 NYC Beach Surveillance and Monitoring Program Summary.” Oct 2006.

⁶⁷ Ibid.

⁶⁸ New York City Council. Int. No. 462-A, 15 Mar 2005. Retrieved from <http://webdocs.nycouncil.info/textfiles/Int%200462-2004.htm?CFID=154878&CFTOKEN=36746839>.

Recommendations

1. Implement “Operation Relief” for beach bathrooms in order to improve maintenance and reduce violations.

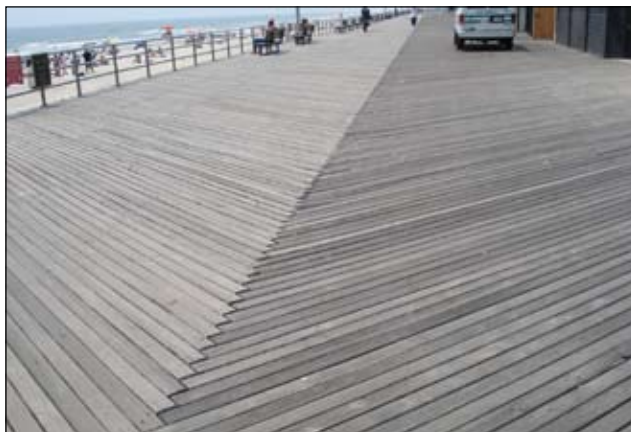
Department of Health data show that the Parks Department has faced a challenge in keeping up with the maintenance required for NYC’s beach facilities during the summer. The DPR has already developed a strategy to improve bathroom performance. This targeted management strategy, “Operation Relief,” has made a significant difference in the conditions of park bathrooms and should be implemented to ensure that beach bathrooms remain clean and safe.

2. Increase the transparency of Parks Inspection Program (PIP) results and include bathrooms and drinking fountains in a beach’s rating.

The Parks Department inspects every beach as part of its nationally recognized evaluation program, the Parks Inspection Program (PIP.) Although these results are posted online, they are difficult to find with no direct link to the information. In addition, inspection data for drinking fountains and bathrooms are not available by the beach and do not impact a beach’s rating. DPR should include these important features in PIP results and provide a link to evaluations from the main page of its website.



With sufficient resources, all beach bathrooms could be maintained to the standard of this bathroom on South Beach in Staten Island.



Seasonal staff help to ensure that beaches are clean and boardwalks are safe to use.

7. WATER QUALITY

Recommendation:

- I. Use and promote stormwater management strategies when developing land throughout the city to improve beach water quality.

By every account, water quality at New York City's public beaches has improved dramatically over the past few decades. The DEP's 2003 *Harbor Water Quality Report* showed that New York City's waterways are the cleanest they've been in 50 years.⁶⁹ Despite this positive trend, the city is far from free of water pollution. Even today, public beaches experience advisories and closures due to dangerous water quality. One of the goals of the mayor's sustainability initiative, PlaNYC 2030, is to "open 90% of our waterways for recreation by reducing water pollution and preserving natural areas," an encouraging step toward improving water quality in the city.

New York City has an antiquated sewer system, in which 70% of stormwater and sewer pipes are combined. Similar sewer systems can be found in more than 700 metropolitan areas in the United States, many of which are older East Coast cities. During dry weather, these pipes direct sewage to treatment plants, where it is disinfected and safely deposited into waterways. However, during a routine rainstorm, the pipes become overwhelmed and overflow into NYC's waterways, depositing untreated stormwater, street litter and raw sewage directly into rivers and bays. These events are called Combined Sewer Overflows (CSOs).⁷⁰

CSOs result in the dumping of an average of 520 million gallons of untreated wastewater into NYC's waterways every week.⁷¹ Released from 460 outfalls into NYC's harbors, CSOs are credited as the biggest source of water pollution and the largest contributor of pathogens (disease-causing organisms) in the city's waterways.⁷²

The DEP has developed an abatement program to lessen the impact of CSOs, and some of these strategies have been adopted by the EPA for its national policy.⁷³ The DEP has focused on two strategies: trapping CSOs before they are released into the harbor and constructing tanks to increase the capacity of the sewer system.⁷⁴ The first is not wholly effective because liquid and dissolvable pollution is not captured; the second method is very expensive.⁷⁵

Water quality is most vulnerable in the warm summer months, as water temperatures rise and flow decreases.⁷⁶ Of course, summer is also the season that beaches are open to and enjoyed by the public, necessitating careful and consistent monitoring to safeguard public health.

⁶⁹ NYC Department of Environmental Protection. "2003 New York Harbor Water Quality Report." Executive Summary. Retrieved March 2006 from <http://www.nyc.gov/html/dep/html/news/depnewshwqs.html>.

⁷⁰ NYC Department of Environmental Protection. "2003 New York Harbor Water Quality Report." Retrieved March 2006 from <http://www.nyc.gov/html/dep/html/news/depnewshwqs.html>.

⁷¹ Riverkeeper. "NYC: Combined Sewer Overflows." http://riverkeeper.org/campaign.php/pollution/we_are_doing/986.

⁷² NYC Department of Environmental Protection. "2003 New York Harbor Water Quality Report." Retrieved March 2006 from <http://www.nyc.gov/html/dep/html/news/depnewshwqs.html>.

⁷³ Surfrider Foundation. "State of the Beach 2005." Retrieved March 2006 from <http://www.surfrider.org/stateofthebeach/>.

⁷⁴ NYC Department of Environmental Protection. "2003 New York Harbor Water Quality Report." Retrieved March 2006 from <http://www.nyc.gov/html/dep/html/news/depnewshwqs.html>.

⁷⁵ Personal interview. Kate Zidar, Lower East Side Ecology Center. 6 July 2006.

⁷⁶ NYC Department of Environmental Protection. "2003 New York Harbor Water Quality Report." Retrieved March 2006 from <http://www.nyc.gov/html/dep/html/news/depnewshwqs.html>.



Water pollution is an infrequent issue at Rockaway Beach due to its location on the open ocean. The beach has experienced very few closure and advisory days in recent years.

Public Beaches Affected by CSOs

Those waterways that do not circulate well with the open ocean, such as the Gowanus Canal and Newtown Creek, tend to be the most polluted. The majority of the city's public beach mileage is on the open ocean, which tends to be relatively clean.⁷⁷

Three public beaches are located near CSO outfalls: South Beach, Midland Beach, and Manhattan Beach. When it rains more than 1.5 inches in six hours, these beaches are issued a twelve-hour "wet weather advisory" because of the potential danger of elevated levels of bacteria. The beach operator is required to post signage notifying the public of the advisory.⁷⁸ Beaches that have been issued a wet weather advisory are not recommended for swimming and bathing, and if testing shows that dangerous levels of bacteria are present, the beaches will be closed.⁷⁹

Monitoring and Public Notification

NYC's Bureau of Public Health Engineering (within the Department of Health) tests water at beaches once a week according to EPA standards. If a section of the beach is closed due to a lack of lifeguards, the DOH does not test the water because the public is not allowed to swim there and thus is theoretically not in danger. Typically, elevated bacteria levels are the result of a known problem – such as heavy rains or a spill in the area. If high levels are detected with no known reason, the department will re-sample the water and, in the meantime, issue an advisory for that beach. The department will return to the site several times within the week to monitor the water and determine whether or not the beach can be safely opened.⁸⁰

When the Health Department issues an advisory or closes a public beach, 3-1-1 operators are notified, and the beach operator must post signage at the site. Notifications are also posted on the DOH website.⁸¹ The EPA operates BEACON, a nationwide database through which the public can access current and historical water quality information for local beaches, available via www.epa.gov.

⁷⁷ NYC Department of Environmental Protection. "2003 New York Harbor Water Quality Report." Retrieved March 2006 from <http://www.nyc.gov/html/dep/html/news/depnewshwqs.html>.

⁷⁸ Personal interview. Angela Ward, Bureau of Public Health Engineering, DOHMH. 6 Apr 2006.

⁷⁹ Bureau of Public Health Engineering, NYC Department of Health and Mental Hygiene. "2005 NYC Beach Surveillance and Monitoring Program Summary." Oct 2005.

⁸⁰ Personal interview. Angela Ward, Bureau of Public Health Engineering, DOHMH. 6 Apr 2006.

⁸¹ Ibid.

**Table 2:
Beach closure and advisory days, 2003–2006⁸²**

Beach	2003		2004		2005		2006	
	Closures	Advisories	Closures	Advisories	Closures	Advisories	Closures	Advisories
Rockaway Beach	3							
Coney Island/Brighton Beach	6							
Manhattan Beach	6			2				1
Orchard Beach			5	5			2	3
Midland Beach	6			2				1
South Beach	6			2		6		1
Wolfe's Pond Beach	6			7	8	2		
Total Closure and Advisory Days	33	0	5	18	8	8	2	6

One of the successes in beach operations is that there have been relatively few beach closure and advisory days in recent years. (It is difficult to examine historical trends due to changes in monitoring standards.) During the summer of 2006, Orchard Beach had the only public beach closure, due to a blocked sewage main that resulted in sewage discharging into the Bronx River.⁸³ Three of the six advisories issued in 2006 were “wet weather advisories,” due to rains that could have led to CSOs. The remaining three advisories, issued at Orchard Beach, were due to the power outage at the Con Edison plant in Queens, which resulted in difficulties treating wastewater.⁸⁴ Summers with heavy rains typically see increased closures due to CSOs.⁸⁵ The August blackout in 2003 led to a relatively high number of closures that year because the DEP was unable to treat wastewater and sewage before it was discharged into the harbor.

Water quality standards will likely become stricter in the coming years. The federal Beaches Environmental Assessment and Coastal Health (BEACH) Act, passed in 2000, sought to improve water quality monitoring and required the EPA to update its measures for water quality within five years, with a target of October 2005. In May 2006, after the EPA had missed this deadline, the National Resources Defense Council (NRDC) filed a lawsuit that alleges that the EPA’s indicators, developed in 1986, are not predictive of many types of waterborne illnesses.⁸⁶ In addition, the testing mechanism requires 24 to 48 hours to process, resulting in delayed information to the public. The EPA is working on technology that will turn around test results more quickly.⁸⁷ If water quality standards become more stringent, beach closure and advisory days in NYC could increase.

⁸² U.S. Environmental Protection Agency, “BEACON: Beach Advisory and Closing Online Notification,” <http://oaspub.epa.gov/beacon>, Nov 2006.

⁸³ Bureau of Public Health Engineering, NYC Department of Health and Mental Hygiene. “2006 NYC Beach Surveillance and Monitoring Program Summary.” Oct 2006

⁸⁴ Ibid.

⁸⁵ Personal interview. Angela Ward, Bureau of Public Health Engineering, DOHMH. 6 Apr 2006.

⁸⁶ Personal interview. Nancy Stoner, director, Clean Water Project. NRDC. 13 Jul 2006.

⁸⁷ Ibid.

How to Reduce CSOs

Policies to reduce CSO events should focus on limiting stormwater runoff. New York City, like many urban areas, is dominated by asphalt and concrete surfaces that easily transfer pollutants to waterways. The Parks Department is doing its part by acquiring and investing in Greenstreets, natural areas, and parkland to help absorb rainwater before it has a chance to overwhelm the sewer system, ultimately improving water quality in the city.

NYC environmental advocacy groups, including Bronx River Alliance and Lower East Side Ecology Center, have signed on to the Storm Water Infrastructure Matters (SWIM) coalition as proponents for this strategy of ensuring clean water. SWIM is focused on capturing stormwater through natural green infrastructure mechanisms so that it will not overwhelm the sewer system. This strategy represents the easiest way to improve water quality in New York City.

Policies to improve water quality should focus on limiting stormwater runoff. By acquiring and investing in Greenstreets, natural areas, and parkland, rainwater will be absorbed before it has a chance to overwhelm the sewer system, ultimately improving water quality in the city.

Chicago has controlled CSOs through a combination of greening and the construction of additional storage for sewage and stormwater. The greening aspect of the program encourages green roofs, permeable paving projects, and green buildings by providing incentives such as density bonuses and grants to developers who use these techniques.⁸⁸

Through PlaNYC 2030, the mayor's office has created important targets for achieving a sustainable city. The plan provides the framework for an active citywide commitment to greening, similar to cities like Chicago.

Recommendation

I. Use and promote stormwater management strategies when developing land throughout the city to improve beach water quality.

As part of its mission, the Parks Department has protected natural areas, developed Greenstreets, and acquired parkland in recent years. To enhance the benefits of these properties, potential impacts on the already stressed sewer system should be considered. Particularly along waterfronts, the Parks Department should work to prevent the addition of impervious surfaces like concrete and the removal of valuable wetlands. Installing landscaped areas and green features rather than impermeable surfaces will reduce stormwater runoff and flooding and, in turn, reduce pollution at beaches.

⁸⁸ NRDC. "Rooftops to Rivers: Green Strategies for Controlling Stormwater and Combined Sewer Overflows." Jun 2006.

8. PUBLIC NOTIFICATION: LESSONS FROM OTHER CITIES

The most important aspect of water quality testing and beach facility inspections is the swift and effective dissemination of this information to the public. Although New York City's Health Department publicizes beach closures and advisories through a variety of ways, New Yorkers should be able to access all types of beach information easily, on the Web and via 3-1-1.

The Chicago Park District's "Swim Report," available on its website, is updated daily in the summer and serves as a one-stop shop for information on the city's 30 beaches, including current advisories or closures, air and water quality and temperatures, visibility, and the previous day's attendance. Because Chicago tests its water daily, water quality information on the site is up to date. The report details individual beach amenities and access issues, including whether or not a site is stroller or wheelchair accessible and what types of sports it can accommodate. The main page of the Chicago Park District's website contains a direct link to the Swim Report.⁸⁹

The Minneapolis Park and Recreation Board (MPRB) is responsible for reporting water quality and beach conditions for its eleven public beaches. Similar to the Chicago Park District, the MPRB's website is frequently updated with information on advisories and closings, water quality and sampling dates, and water temperature.⁹⁰ The MPRB office also collects data on each day's rainfall, wind speed, and direction, along with the previous day's attendance.⁹¹

New Yorkers would greatly benefit from access to this type of information. Rather than providing scattered information on multiple websites, the Parks Department should team with the Department of Health and the Department of Environmental Protection to offer city residents a similar clearinghouse for beach information on the Web during the summer. There should be a direct link to such a site from nyc.gov, the city's main page, and 3-1-1 operators should be responsible for delivering such information as well.

Recommendation

I. Establish a New York City Beach User's Guide on the Web that provides a variety of essential health, safety, and user information drawn from multiple city agencies.

The Parks Department should collaborate with the Department of Health and the Department of Environmental Protection to provide comprehensive and up-to-date information on New York City beaches, including water quality, the results of facilities inspections by all three agencies, weather trends, and amenities, so that beach users can prepare for fun and safe visits to the beach. This information should also be available via 3-1-1.

⁸⁹ Chicago Park District Swim Report. Retrieved July 2006 from http://www.chicagoparkdistrict.com/index.cfm/fuseaction/swim_report.home.cfm.

⁹⁰ Minneapolis Park and Recreation Board. "Swimming Beaches." Retrieved July 2006 from <http://www.minneapolisparcs.org/default.asp?PageID=503>.

⁹¹ Minneapolis Park and Recreation Board. "2004 Water Resource Report," page 174.

CONCLUSION

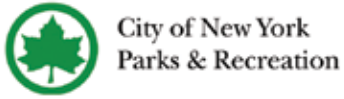
New York City's 14 miles of public beaches are a tremendous asset to city residents. They provide recreation opportunities that are not afforded anywhere else in the city, and they represent some of the few points along the 578 miles of waterfront where New Yorkers can approach, touch, and swim in the water.

The Parks Department has faced several challenges in the operations of the seven beaches in its jurisdiction. Recruitment of lifeguards has been the most significant challenge. It is essential that the training and testing process for lifeguards be assessed to ensure that interested applicants are encouraged to participate. Additionally, by doubling the salary for those hard-to-serve beaches, the DPR would likely reduce beach closures and would be able to assess the significance of compensation in the hiring process. The Parks Department and the Department of Education cooperate to bring free swimming programs to youth. These programs should be expanded, and all swimming facilities within schools should be open so that the maximum number of children can be accommodated.

Sufficient, consistent maintenance of city beaches has also posed a challenge. According to Health Department inspection data, beach bathrooms are performing poorly. The Parks Department should implement their targeted maintenance plan, "Operation Relief," for beach bathrooms. This management strategy successfully improved the conditions of neighborhood park bathrooms and would help to ensure that beach bathrooms are open, clean, and safe to use. Seasonal staffing levels should be increased to provide beaches with needed maintenance attention.

The Parks Department plays an extremely important role in ensuring that water quality in New York City continues to improve. As the holder of 28,800 acres of parkland, the department's green properties have the capacity to capture rainwater before it overwhelms the sewer system, which results in dumping untreated sewage into our waterways. The DPR and City should develop land with an active eye toward stormwater management, and whenever possible should install green features rather than impervious surfaces.

Finally, the public must have easy access to information on the conditions of their beaches. A "Beach User's Guide" should be established online that synthesizes data on water quality and inspection results and offers information on beach amenities, directions, and operating hours, so that any New Yorker can access the most up-to-date information to prepare for a safe, healthy, and fun day at the beach.



The Arsenal
Central Park
New York, New York 10021

Adrian Benepe
Commissioner

July 16, 2007

Mr. Christian DiPalermo
New Yorkers for Parks
The Arthur Ross Center
for Parks and Open Spaces
355 Lexington Avenue, 14 Floor
New York, NY 10017

Dear Mr. DiPalermo:

Thank you for giving us the opportunity to review and respond to the Raising the Tide: Strategies for New York City Beaches report. I appreciate the tremendous effort that was put forth in its preparation. The report has illuminated some of the challenges associated with urban beaches, and has enhanced the policy dialogue regarding their maintenance, management, and operations.

Nonetheless, I am proud of New York City's beaches, and specifically of the significant investment we have made in their care. Today, our beaches are cleaner and safer, and they are more accessible than ever before. Perhaps most significantly, we have encouraged an array of activities and programming that attract a diverse group of New Yorkers and visitors. Beachgoers are flocking to the waterfront in record numbers with over 20 million visitors last summer.

As part of Mayor Bloomberg's PlaNYC vision for New York City, we will continue to expand our city's waterways and greenways, making the City's beachfront an increasingly popular and accessible destination. I look forward to working with New Yorkers for Parks and other organizations and individuals to help maintain New York's status as the greatest harbor city in the world.

Thank you again, and I hope that you will take our response into consideration.

Sincerely,

A handwritten signature in blue ink that reads "Adrian Benepe".

Adrian Benepe

Parks Response to New Yorkers for Parks Position Paper on Beaches

July 13, 2007

1. Introduction – NYC Public Beaches

By every measure, New York City's beaches are in better shape now than at any other time, with more than \$50 million invested in capital beach improvements and surrounding recreational resources since 2002, stronger performance measurement systems, better technology, close partnerships with the NYPD, dedicated community partners, expanded waterfront recreational opportunities and ADA access.

In summer 2006, over 20 million visitors enjoyed our beaches, from families who picnic at Orchard Beach, also known as the Bronx Riviera, to amateur beach volleyball players who play a pick up game on Coney Island, the new home of the AVP pro beach volleyball Brooklyn Open. Besides swimming and sunbathing, beachgoers also delight in an array of public programming and special events offered at the beach, including surfing, kite-flying, dance lessons on the boardwalk, and Urban Park Ranger education sessions on beach flora and fauna. The diverse forms of recreation that City beaches host is a testament to how beaches have evolved to meet the changing needs of the public.

In their report, New Yorkers for Parks has illuminated some of the issues associated with urban beaches and enhanced the policy dialogue regarding their maintenance, management, and operations. Parks & Recreation's responses to specific items are outlined below.

Finally, Parks would like to note that New Yorkers for Parks' policy paper is not a comprehensive report on public beaches in New York City. A full report should also include issues that impact all beaches and coastal areas, including management of beach erosion and endangered species habitats, coastal storm management, and recreation access and add to the debate on these important issues.

2. The Parks Department: 1987-2007

The report overlooks significant investments made in the past five years to City beaches, the planning efforts that envision an exciting future for New York's waterfront, and the substantial staff and agency budget increases that have improved the cleanliness, management, and safety of beaches.

The claim that "Parks maintenance staff is largely composed of welfare-to-work participants" is outdated. The Parks Department's expense budget has been rising steadily since 2002 under the Bloomberg administration, resulting in a major increase in full-time staffing. We currently have 4,000 full time staff, 3,311 Job Training Participants, and 3,000 seasonal employees. Parks are in better shape now than at any time in the last four decades, and are improving, thanks to our \$2.7 billion capital plan, a larger expense budget, and an enormous network of park support groups.

While Parks continue to benefit from public-private partnerships, there is no "increasing reliance on private funding", as the vast majority of maintenance, recreation, and security services are paid for by public funds. Job Training Participants (JTPs) provide an essential function at parks as they are trained and equipped to address maintenance needs at the facilities they maintain. In addition, this program provides an important service to the City and adds additional resources to the beaches.

Contrary to NY4P's statement, data on private funding for park properties is all accessible through publicly disclosed documents like IRS Form 990s. The Parks Department does not receive any private funding for beach maintenance or capital improvements, although private resources, like nonprofit group volunteer hours, do contribute to the quality of our beaches.

3. Roles of Government Agencies in Public Beach Operations

Federal and state beaches in New York City and the immediate area, which also serves New York City residents, are omitted from this section.

4. City Beaches and Community Needs

This section offers an incomplete profile and history of each municipal beach by failing to mention the significant capital improvements and programming additions made to City beaches.

Since 2002, Parks & Recreation has spent over \$50 million on capital improvements to all of New York City's beaches, in addition to routine maintenance work that Parks provides such as repairing boardwalks, fencing, railings, electricity, and plumbing. Major capital work completed since 2002 has included new or improved playgrounds, comfort stations, boardwalk lights, shade pavilions, lifeguard stations, skate parks, beachfront athletic fields, gazebos, stairs, ramps, benches, overlooks, greenways, reconstructed concession areas, structural renovations to beach pavilions, and the installation of "mobimats," ADA-accessible beach mats.

We will continue to invest in our beaches and the adjacent parkland. Mayor Bloomberg's PlaNYC, a roadmap to the sustainable growth of New York City by the year 2030, allocates approximately \$1 billion in capital funds for various park projects citywide. In particular, there is \$40 million in capital funding to create new parks in Rockaway. Furthermore, the privately developed Arverne-by-the-Sea and Arverne East projects will include new public parkland adjacent to the beach. When all these projects are complete, the Rockaways will not only be a destination for its beautiful beaches, it will also be home to great regional parks. Similarly, in Coney Island, the Coney Island Development Corporation plans to create new and vibrant parks and public spaces near the shore.

5. Lifeguards and Staffing

Qualifications, Salary, and Training

For the third year in a row we have employed more than a thousand lifeguards, and this summer, with 1080 lifeguards hired to date, we have set another new record. This has allowed us to open more beach for swimming on a regular basis and expanded programming at pools and is a direct result of our aggressive marketing, promotion and recruitment efforts.

The New York State Department of Health reviews and approves lifeguard training programs on the basis of course material, instructor qualifications, course administration and records management. The Parks Department's Municipal Lifeguard Training Program is fully authorized by the State to certify lifeguards in all categories, unlike the American Red Cross, which can not certify lifeguards for surf beaches, or the United States Lifeguard Association, which is not authorized to issue lifeguard certifications in New York State. The Municipal Lifeguard Training Program is administered by Parks employees who are union members, not "overseen" by the union, as characterized in the report. The Municipal Lifeguard Training Program has developed thousands of young men and women into skilled, professional lifeguards who protect millions of swimmers each summer.

The Red Cross does set the industry standard for lifesaving theory and practice and we make extensive use of their training material in our program. The decentralized nature of the Red Cross certification process, however, does not provide the consistency, focus, and quality control that is essential for effectively managing over 1,000 employees at more than 70 sites. Red Cross certifications also cost in excess of \$300, while our program is free. In addition, successful candidates who work as lifeguards at our facilities are paid for the time spent training.

Lifeguard instructors play an important role in the recruitment process. They network extensively with swimming coaches and conduct clinics and qualifying tests at schools and recreation centers in all five boroughs in advance of the training season. For more than 10 years, satellite training has been offered in Rockaway and Staten Island and where sufficient demand existed, in Brooklyn and other Queens schools as well. The Lifeguard School, located at the West 59th Street Recreation Center, is accessible by major subway lines serving Brooklyn, the Bronx, Queens and Manhattan, and many candidates prefer the flexible schedule offered there to the fixed dates and times of the satellite training facilities. The final swimming test remains pass/fail, but this year a clock was placed on the deck when testing new candidates to dispel myths of favoritism or arbitrary treatment. Candidates are also welcome to time themselves if they so choose.

We do not agree that parents, guardians or coaches should be present during lifeguard testing. They are not allowed to provide “support” during Regents or SAT tests, nor can they attend other civil service examinations. Lifeguard instructors are expected to exercise their professional judgment when assessing candidates for these highly responsible public safety positions and should not be subject to second guessing when doing so.

Recruitment

The Parks Department knows better than anyone the importance of recruiting as many qualified lifeguards as possible to staff City beaches and pools. Each year, Parks launches an aggressive recruitment effort, with extensive outreach to community boards, elected officials, schools, libraries, and swim teams in New York City and across the country. Furthermore, Parks has a marketing campaign that includes PSAs, promotional events, press conferences, signage, and direct mail, resulting in a new record of 1080 lifeguards, the most ever, for the 2007 summer swim season.

Parks seeks to recruit the most qualified lifeguards to staff City beaches, and keeps the highest standards to ensure public safety. Lifeguard applicants must be able to swim 50 yards in less than 35 seconds with proper form, with at least 20/30 vision in one eye and 20/40 in the other, without corrective lenses. These requirements help Parks recruit the most highly qualified candidates who can protect New Yorkers at the beach and ensure a safe, fun, and successful summer.

Swimming Programs

In 2006, nearly 12,000 New York City children ages one-and-a-half to fourteen participated in Parks’ free *Learn to Swim* program. The program was expanded this year, adding additional sites and sessions to serve even more children. Parks hopes to continue increasing Learn to Swim to set the foundation for the next generation of NYC lifeguards.

In the 2006 school year, nearly 7,000 additional children learned water safety skills at Parks, YMCA and Asphalt Green pool sites through the free program, *Swim to Safety*. This is an initiative with the Department of Education and the YMCA to teach young children basic water safety skills and reduce water-related child mortalities. Parks fully supports expanding swim programs across the city and welcomes potential partners. However, training for lifeguarding positions at Parks Department beaches and pools must be conducted through the Municipal Lifeguard Training Program. All lifeguard training for the “Region 5/Rockaway” program was conducted by Parks Department employees at either Far Rockaway or John Adams High Schools. Only the final test was held at the West 59th Street Recreation Center, as it is for all applicants. Fifty candidates completed training, 48 were offered positions, while 43 worked as lifeguards during 2006.

Other Beach Staff

Parks agrees with NY4P’s suggestion that PEP officers who are posted at beaches should have specific training on responding to beach-related emergencies. However, PEP officers should not enter the water to attempt a rescue; only qualified lifeguards should.

Recommendations:

1. **“Improve recruitment by administering training where there is a demand and enhancing the transparency of testing.”**

- Parks has an extensive training and testing program, with sites in all five boroughs. When there is sufficient demand, we are open to expanding lifeguard training to new sites.
- There is an open and fair testing process, which includes a visible timing clock.

2. **“Double the salary for lifeguards at underserved beaches.”**

NYC lifeguard salaries are comparable with those of other municipalities, and in some cases, exceeds those paid in neighboring jurisdictions. We do not favor a “two-tiered” salary structure that would pay significantly more to lifeguards at Rockaway Beach. In many ways, being a lifeguard at a busy City swimming pool is just as challenging as working at a beach. Lifeguard salaries are determined by title, not by location, and we believe doing so would be inequitable to the communities served across the City. But we do agree that higher salaries are likely to attract more qualified candidates. Wages for all City employees are set through the collective bargaining process and cannot be enacted unilaterally.

6. Maintenance and Inspections

Our trained inspectors survey the beaches as part of the internationally recognized Parks Inspection Program (PIP). Though we inspect beach zones throughout the year, we inspect every beach zone including the sand portion of each beach once every summer (Memorial Day to Labor Day). Beaches are inspected for Cleanliness (glass, graffiti, litter, weeds) and any Structural or Horticulture features that may exist. Operations Planning & Management office (OMP) ratings are posted on the Parks website and on beach bulletin boards.

Recommendations:

1. **Implement “Operation Relief” for beach bathrooms in order to improve maintenance and reduce violations.**

Operation Relief is a program designed to restore water features, including comfort stations and drinking fountains that are not functioning. With the exception of several buildings in the Arverne section of the Rockaways that were closed decades ago, all of our beach comfort stations and drinking fountains are operational, though of course some are occasionally in need of maintenance and repair. Beach comfort stations and drinking fountains are measured by the same standards applied to those features throughout the park system, which were developed to complement Operation Relief. In 2006, our inspectors found beach comfort stations open and available for public use 90% of the time and beach drinking fountains fully functional, with no problems 88% of the time, based upon random unannounced visits. There is certainly room for improvement with these results and we agree that our inspection criteria should mirror that used by the Health Department in its inspection of beach facilities. But just as park and playground conditions have improved citywide as a result of rigorous performance measurements, we are confident that the reliability and quality of water features at our beaches will continue to improve as well.

2. **Increase the transparency of Parks Inspection Program (PIP) results and include bathrooms and drinking fountains in a beach’s rating.**

Parks agrees that our PIP inspection results could be more easily available and accessible on our web site. We will look into creating an easily searchable link on our site for PIP ratings.

7. New York City Water Quality

Recommendations:

1. **Use and promote stormwater management strategies when developing land throughout the city to improve beach water quality.**

Parks is very committed to this issue, along with other agencies. Under the Mayor's PlaNYC initiative, the Department of Environmental Protection is undertaking a plan to implement a series of Best Management Practices that have a significant storm water management component in order to improve water quality. More information can be found in the in the "Water" chapter of the PlaNYC report.

8. Public Notification: Lessons from Other Cities

Recommendations:

1. **"Establish a NYC Beach User's Guide on the Web that provides a variety of essential health, safety, and user information drawn from multiple city agencies."**

Parks offers much of this information on its web site already and will look at ways to improve the site further.

9. Conclusion

As stewards of New York City's 14 miles of public beaches, Parks & Recreation strives to provide a safe, fun, and rewarding experience to all beachgoers. Last summer, more than 20.7 million people visited the City's seven public beaches, serving as a testament to the extreme popularity of this recreational waterfront. And thanks to the vigilance of our lifeguard corps, there were no drownings at any of the City's beaches or pools during operating hours.

Parks appreciates the suggestions that New Yorkers for Parks has made regarding how to improve the quality of the visitor experience at beaches and plans to implement several of them. The report unfortunately does not acknowledge any of the numerous improvements made to City beaches during the Bloomberg administration or the extensive planning now underway for beaches throughout the City. And as it is limited to the traditional swimming beaches, the report does not consider other aspects of waterfront recreation. As the City continues to transform the historically industrial waterfront, Parks will work to expand opportunities for waterfront recreation, including parks, greenways, kayaking, canoe launches, and marinas. Mayor Bloomberg's PlaNYC aims to open up 90% of the City's waterways for recreational opportunities and over the next four years, alone, over \$420 million in capital improvements will be made to the waterfront to create new and enhance existing access to the City's shoreline and waterways. New Yorkers will be more connected to the waterfront than ever, and the City will see a great new –and remarkably different – era of waterfront activity.



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