



New York City Environmental Justice Alliance

166A 22nd Street, Brooklyn, NY 11232 | www.NYC-EJA.org

On the ground – and at the table

New York City Environmental Justice Alliance testimony to NYC City Planning Commission on Proposed Industry City Rezoning

My name is Jalisa Gilmore and on behalf of the New York City Environmental Justice Alliance I stand in solidarity with our member organization, UPROSE in opposing the proposed Industry City rezoning. Founded in 1991, NYC-EJA is a citywide network of grassroots organizations from low-income communities and communities of color in environmentally overburdened neighborhoods – including those serving industrial waterfront communities on the frontlines of coastal environmental hazards and climate change.

In 2010, NYC-EJA launched the Waterfront Justice Project, New York City's first citywide community resiliency campaign. The Waterfront Justice Project began as an advocacy campaign to reform waterfront zones designated as the Significant Maritime and Industrial Areas (SMIAs.) These were zones created by the NYC Waterfront Revitalization Program (WRP) to encourage the protection and siting of industrial and maritime uses along the waterfront. Additionally, the Waterfront Justice Project seeks to build climate resilience along the working waterfront, in communities like Sunset Park – which is home to the largest SMIA in NYC – while promoting local industrial business. The proposed Industry City rezoning goes against community concerns, but is in opposition to building a truly climate resilient waterfront.

New York City needs a diverse economy that supports working and middle class families. In Sunset Park, industrial sector jobs offer the best paid jobs, but currently less than 17% of Industry City is occupied by manufacturing uses, offering limited opportunities for families to access well-paid working class jobs. Promoting and preserving industrial jobs and manufacturing zoning in New York City is a key component of creating a resilient and thriving economy and Industry City threatens this by building luxury retail and commercial uses on the industrial waterfront.

The Climate Leadership and Community Protection Act (CLCPA), which legislates commitments to reduce greenhouse gas emissions by 85% in NYS by 2050 is expected to create over 150,000 new green jobs. These new climate jobs, including solar and wind manufacturing, green infrastructure, and coastal resilience, need industrial infrastructure to ensure local benefits and sustainable economic development. Sunset Park has the opportunity to lead a Just Transition as a frontline community that is already facing the impacts of a changing climate.

Furthermore, The Draft Environmental Impact Statement (DEIS) does not adequately evaluate concerns around historic chemical contamination and current chemical uses in the proposed site for rezoning. The review of regulatory environmental databases as part of the City Environmental Quality Review was performed with 2012 and 2017 data which is considered data outside of the 6-month requirement. The DEIS recognizes environmental contamination as part of the SMIA's history but lacks sufficient information around specific potential pathways for chemical exposure or information regarding the remediation of existing chemical contamination. Lastly, as documented by NYC-EJA's Waterfront Justice Project, the proposed area is vulnerable to chemical dislodgement from climate change and extreme weather; this should be considered in the final EIS, as is required by the City's Waterfront Revitalization Plan.

NYC-EJA endorses a balanced approach to waterfront policy that bolsters waterfront communities by promoting economic growth while protecting the environment and advancing equity. We must completely reimagine our urban coastlines as a critical resource in the fight for climate resiliency; not as areas for potential luxury development, but as sites for ecologically-sound climate solutions that protect our society's most vulnerable. The Green Resilient Industrial District or GRID developed by UPROSE and the Collective for Community, Culture, and the Environment does just that; while being rooted in social equity and climate justice, and is a superior alternative to the proposed Industry City rezoning.