



New York City Environmental Justice Alliance

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On the ground – and at the table

New York City Environmental Justice Alliance testimony to the NYC Council Committee on Environmental Protection & Committee on Resiliency and Waterfronts on the 7th Anniversary of Superstorm Sandy

October 29, 2019

My name is Jalisa Gilmore and I am here to testify in support of Intro 1620, the 5 Borough Resiliency Plan, on behalf of the New York City Environmental Justice Alliance (NYC-EJA). Founded in 1991, NYC-EJA is a non-profit citywide membership network linking grassroots organizations from low-income neighborhoods and communities of color in their struggle for environmental justice. NYC-EJA empowers its member organizations to advocate for improved environmental conditions and against inequitable environmental burdens. Through our efforts, member organizations coalesce around specific common issues that threaten the ability of low-income and communities of color to thrive, and coordinate campaigns designed to affect City and State policies – including addressing climate change threats to the resilience of waterfront communities.

NYC-EJA member organizations represent environmental justice communities overburdened by flood hazards, proximity to waterfront industrial zones, lack of green and open spaces, air pollution caused by dirty industry clustered in their neighborhoods, and extreme heat events. Therefore, we understand first-hand the urgency of the climate crisis and the need for innovative climate adaptation strategies that can be incorporated into the 5 Borough Resiliency Plan. As NYC-EJA's Executive Director, Eddie Bautista and Council Member Brannon highlighted in today's op-ed, NYC isn't remotely ready for the next superstorm, there has not been nearly enough investment in the low income communities of colors in the outer-boroughs where the most vulnerable populations are. We would like to thank Council Members Constantinides, Brannon, Koo and Levin for introducing a plan that aims to protect all of NYC's boroughs from climate change, sea level rise, and sunny day flooding. There are a few considerations that we would like the City Council and the Mayor's Office of Resiliency to take into account as the plan moves forward.

NYC-EJA has long advocated for climate adaptation measures in New York City's industrial waterfront neighborhoods, given its vulnerability to climate change impacts and hazardous toxic exposures that may result in the event of severe weather. In 2010, NYC-EJA launched the Waterfront Justice Project, New York City's first citywide community resiliency campaign. NYC-EJA discovered that the Significant Maritime and Industrial Areas (SMIAs)—clusters of heavy industry along the waterfront— are all in hurricane storm surge zones, and in environmental justice communities. When considering how to protect NYC's shoreline, the 5 Borough Resiliency Plan should consider measures that also protect communities from the cumulative contamination exposure risks associated with clusters of heavy industrial uses in such vulnerable locations.

According to the NYC Panel on Climate Change, NYC is predicted to experience anywhere from 8 to 30 inches of sea level rise by the 2050s. The plan should consider both sea level rise and storm surge, alongside the FEMA Flood Insurance Rate Map when determining the community districts that should be evaluated for climate change resiliency adaptation measures to ensure that all the communities who will be impacted by climate change impacts are included.

Several waterfront communities were involved in post-Sandy community planning efforts and have not seen these plans fully implemented. The 5 Borough Resiliency plan should make sure to incorporate the research and community input resulting from processes such as the Hunts Point Resiliency, East Side Coastal Resiliency,

and East Harlem Resiliency. The plan should ensure that there is extensive community engagement with the communities that developed these plans.

Additionally, we are disappointed in the inequitable investments to date in climate adaptation and resiliency. For example, during the Hunts Point Resiliency process the Hunts Point Food Distribution Center only received a few million for a feasibility study, yet Mayor de Blasio has committed \$10 billion for protecting the financial district. The community and local stakeholders explicitly asked for coastal resiliency, and while the NYC Mayor's Office of Resiliency and the NYC Economic Development Corporation made promises, there was no real commitment.

Furthermore, it is critical that the 5 Borough Resiliency Plan inform the US Army Corp of Engineers (USACE) New York and New Jersey Harbor and Tributaries Focus Area Feasibility Study to ensure that ecologically-grounded coastal protection and nature-based shoreline infrastructure are prioritized.

Lastly, we have also have questions that we would like considered as the plan moves forward. Such as why climate adaptation measures will only be evaluated for residential buildings no more than three stories in height? Which agency and/or office will be responsible for implementing the plan? And how will that entity ensure that the plan is complementary to the NYC Department of City's Planning's 2020 Comprehensive Waterfront Plan?

New York City government has not committed to equitably protecting waterfront communities from climate change, and we believe the 5 Borough Resiliency Plan is an opportunity to remedy this shortfall. NYC-EJA would like to thank the New York City Council for holding this oversight hearing on the 7th Anniversary of Superstorm Sandy and for the opportunity to testify.