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On the ground – and at the table.

New York City Environmental Justice Alliance testimony to the NYC Department of City Planning regarding the Draft Scope Work for an Environmental Impact Statement for Industry City 220 36th Street, Brooklyn, NY

My name is Kartik Amarnath and I am here to testify on behalf of the New York City Environmental Justice Alliance (NYC-EJA). NYC-EJA is a non-profit citywide alliance 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.

As champions of community-based planning for over a quarter century, we are particularly concerned about the exclusionary nature of this review process. Specifically, we find it deeply problematic that organizers felt it would be appropriate to host a public meeting in Manhattan to discuss a zoning proposal for Sunset Park. It is unacceptable to expect residents from Sunset Park, historically a working class waterfront community, to adjust their work schedules and make arrangements to attend a public hearing in Manhattan in time to provide testimony. Moving forward, we recommend arrangements be made to ensure a truly public planning process can take place where Sunset Park residents can meaningfully participate in determining the future of their neighborhood.

As a part of the Environmental Impact Statement, we recommend that greenhouse gas emissions and climate impacts be quantitatively assessed for each proposed scenario, including greenhouse gas emissions from construction and added traffic. Given Sunset Park's vulnerability to extreme weather events, we also recommend an analysis of impacts on social resiliency and cohesion. This would include short and long term impacts from increases in construction, traffic, and property values that can exacerbate gentrification and displacement risks.

Additionally, we recommend that other environmental, economic, and public health impacts be analyzed as part of the EIS. Firstly, we recommend an investigation of noise impacts from increased traffic and throughout the duration of new project construction, particularly in relation to effects for residents. The draft scope of work states, "a public health analysis is not warranted if a project does not result in a significant unmitigated adverse impact in other CEQR analysis areas." We recommend that an analysis of public health impacts be an essential component of the EIS given the multifaceted health outcomes that can result from changes to the built environment highlighted in the given zoning proposal. We recommend analyzing public health impacts related to projected air and water quality based on how zoning changes may influence traffic, construction, and storm water runoff. Public health impacts from enhanced gentrification pressures should be a core component of any public health analysis. Studies have documented how displacement can exacerbate negative public health outcomes such as collective trauma resulting from community fragmentation.

Studies of construction impacts should not only focus on property development, but also the development of supporting energy, transportation, water, and sewer infrastructure. Construction impacts should be comprehensively analyzed as they relate to quality of life considerations such as parking, waste generation, public waterfront access, and outcomes for businesses near construction zones. To this regard, the EIS should establish commitments to create a map of expected construction zones so that stakeholders can monitor changes to the built environment.

We thank you for your time and consideration of the aforementioned recommendations. NYC-EJA looks forward to supporting the residents of working waterfront neighborhoods, including Sunset Park, as we work collectively to build a more just and resilient city.