



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 Department of Environmental Protection on amendments to the existing Community Right-to-Know Regulations

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My name is Jalisa Gilmore and I am here to testify in support of the proposed amendments to the Community Right-to Know Regulations 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 pollution prevention and climate resiliency.

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 the cumulative impacts of potential hazardous 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) are all in hurricane storm surge zones, and that the City had not analyzed the cumulative contamination exposure risks associated with clusters of heavy industrial uses in such vulnerable locations. Through the Waterfront Justice Project, NYC-EJA has worked to mitigate the threat of potential toxic exposure faced by low-income communities and communities of color in and around the SMIA's.

NYC-EJA works with our member organizations and advocates in the South Bronx and Sunset Park SMIA's to understand public health risks of products used by small chemical intense businesses that may be released into the environment during a storm surge event. A key component of this effort is to work with local businesses to develop resources to help implement chemical security practices to reduce the threat of chemical releases in the event of extreme weather.

We support the proposed amendments to the Community Right-to-Know Law to require spillage prevention measures for portable containers of hazardous substances in order to prevent releases of hazardous substances in case of an extreme weather event. We encourage DEP to facilitate access to technical and financial resources for local industrial businesses that need support in implementing the pollution prevention strategies proposed in the new rule. Additionally, we hope the City continues to implement similar measures that support climate resiliency and pollution prevention.

NYC-EJA would like to thank the New York City Department on Environmental Protection for holding a hearing on this proposed rule change, creating an opportunity for public comment on this important measure. We support the proposed rule change to the Community Right-to-Know Law and look forward to continued collaboration with the City in this regard.