



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

On the ground – and at the table

Sharon Lee
Queens Borough President
Queens Borough Hall
120-55 Queens Boulevard
Kew Gardens NY 11424

February 10, 2020

Re: Opposition to the Special Flushing Waterfront District Proposal’s ULURP Application

Dear Borough President Sharon Lee:

The New York City Environmental Justice Alliance stands in solidarity with our member organization Chhaya CDC and members of the Flushing for Equitable Development and Urban Planning (FED-UP) coalition in opposing the Flushing Willets Point Corona Local Development Corporation’s (the LDC) proposed Special Flushing Waterfront District (SFWD) Uniform Land Use Review Procedure (ULURP) application. 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 frontline of coastal environmental hazards and climate change.

In the age of the climate crisis, coastal planning must center the needs of frontline communities and support resilient, sustainable, and affordable neighborhoods with access to good, green jobs. Unfortunately, the rapidly rising flood of luxury waterfront development in increasingly risky areas of New York threatens this vision. The SFWD proposal is no different, proposing needless private development with little community input that threatens the existing diverse, working-class and immigrant community while doing very little to address coastal climate risks.

No Attention to Coastal Climate Risks

We are particularly concerned at the proposal’s overall lack of attention to coastal climate and environmental health risks. Most of the proposed development is situated within the combined 100 and 500 year floodplain, including the meager supply of affordable housing. This is particularly distressing given the legacy toxic pollution of Flushing Creek, which regularly swells during heavy rain storms, flooding pathways in Flushing Meadows-Corona Park, the streets of Willets Point, and even portions of the Van Wyck Expressway. These storms also overburden our sewage system, which leads to a discharge of raw sewage from the 3 combined sewer outfalls located in the creek. It is unconscionable to relegate affordable housing to risky

contaminated areas without any consideration for coastal protection, perpetuating historic environmental racism and inequality by exposing low-income people and people of color to toxic water. Climate resilience must be an essential component of any proposed rezoning along our coastline. Nature-based solutions such as living shorelines and green infrastructure must be prioritized to meet the pressing climate resilience challenges ahead.

Undervalues Manufacturing Land as Hub for Climate Jobs

NYC-EJA endorses a balanced approach to waterfront policy that bolsters local communities by promoting economic growth and advancing equity, while protecting and improving our waterways. We envision innovative waterfront industrial zoning and programs that set the standard for environmentally-conscious development while enhancing community resiliency. The industrial sector has historically provided people of color and immigrants with family-sustaining jobs, and NYC-EJA believes that promoting and preserving industrial jobs and manufacturing zoning in New York City is a key component of creating a resilient and thriving economy.

Waterfront manufacturing zones should be seen as a critical asset to the Just Transition, and not an opportunity to build needless hotels and high-rises for the elite. The Climate Leadership and Community Protection Act (CLCPA), which legislated commitments to reduce greenhouse gas emissions by 85% in NYS by 2050 has the potential to create over 150,000 new green jobs. These new climate jobs, including solar and wind manufacturing, green infrastructure, and coastal resilience, require industrial infrastructure to ensure local benefits and sustainable economic development.

Lack of Meaningful Community Input

We echo concerns by the FED UP coalition that the ULURP process has failed to incorporate meaningful community input. As a result, the proposal lacks a plan for any public institutions that are essential to service an already densely populated area; there is no stated intention to increase the number of public schools, libraries, youth centers or senior centers, which are also critical to facilitating the social cohesion that helps bolster community resiliency.

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. Environmental justice communities who are on the frontlines of the crisis must be at the forefront of the solutions. Given the abysmal attention to the existing community's needs, to the risks of toxic exposure, storm surge, and sea level rise, and undervaluing of manufacturing land as part of a Just Transition, NYC-EJA strongly opposes this application.

Sincerely,
Priya Mulgaonkar
Resiliency Planner, NYC Environmental Justice Alliance