



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 New York City Council Committees on Land Use and Economic Development on Int 1012

June 29, 2023

Good afternoon, I am Kevin Garcia, the Transportation Planner with the New York City Environmental Justice Alliance. Thank you to the Chairs and committee members here today for the opportunity to share comments.

Founded in 1991, the New York City Environmental Justice Alliance (NYC-EJA) is a non-profit, 501(c)3 citywide membership network linking grassroots organizations from low-income 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 by the coordination of campaigns to inform City and State policies. Through our efforts, member organizations coalesce around specific common issues that threaten the ability of low-income communities of color to thrive.

NYC-EJA is also part of the Last-Mile Coalition, a citywide coalition of environmental justice and public health advocates working to regulate last-mile trucking facilities in New York City.

NYC-EJA has long supported building a climate-resilient industrial waterfront while promoting local industrial jobs. Many of our members are based in or near industrial business zones, and we understand the importance of these areas for the economic vitality of working-class communities across the city. While recognizing the significance of the industrial sector in achieving clean energy goals and fostering economic opportunities, [Intro 1012](#) needs to address some critical concerns to ensure a comprehensive and equitable approach to industrial development.

One concern is the need for more emphasis on environmental justice within the bill. The legislation does not prioritize environmental justice concerns explicitly, nor does it address the disproportionate impacts of industrial activities on marginalized communities, such as exposure to pollution and other health risks. It is vital to incorporate explicit measures that effectively address these disparities and ensure equitable distribution of the benefits arising from industrial development among all communities. Furthermore, our industrial sector has provided stable and well-paying jobs for many environmental justice community members, this legislation should prioritize environmental justice communities in educational, training, and workforce opportunities as the transition to green industrial jobs continues to prevent job loss and displacement. By integrating specific provisions that center on environmental justice, we can strive to mitigate the adverse impacts on marginalized communities and foster a more inclusive approach to industrial development.

Another area of concern is insufficient community engagement. While the bill does include a public hearing to solicit public comment and feedback before the release of the draft industrial development action plan, the bill does not include a thorough structure or process for meaningful community participation. The legislation should mandate additional public hearings, especially within or in partnership with communities adjacent to the Industrial Business Zones, to ensure a thorough and inclusive approach. Communities affected by industrial activities must be allowed to influence the shaping of the industrial development plan. The legislation should explicitly mention actively including community representatives, grassroots organizations, and existing community plans in formulating the industrial development plan.

While the bill recognizes the importance of green energy and energy-efficient upgrades, the bill needs to provide detailed guidelines or requirements for sustainable practices. This legislation must include pollution prevention provisions promoting clean technologies, waste reduction, improved food access, enhanced pedestrian safety, increased vegetation, and green open space. The legislation should align with the targets of the Climate Leadership and Community Protection Act and refer to the goals of up to 40 percent investment in disadvantaged communities.

Lastly, there is a concern about defining the industrial sector within the legislation. The bill should explicitly acknowledge green and clean energy manufacturing as industrial uses. Including movie and sound recording studios as industrial uses need to be clarified, and there is concern regarding the possibility of last-mile warehouses being defined as industrial uses. Last-mile warehouses are **not** defined in the City's Zoning Resolution; they are treated as traditional warehouses but demand hundreds of daily van and truck trips, which congest our roads and lead to more air pollution. Since these are not traditional warehouses, these facilities must be defined based on use and size. A special permit process must be created as our zoning text amendment application would do. This will help protect our communities and help the city plan accordingly for these facilities.

In conclusion, the Int 1012 bill requires improvements in addressing environmental justice concerns, enhancing community engagement, and prioritizing sustainable practices within the industrial sector. By incorporating stronger provisions in these areas, we can strive for an equitable and sustainable approach to industrial development.

Thank you for your time again. I will submit longer written comments later.