



April 28, 2023

New York City Environmental Justice Alliance Testimony on PlaNYC

Good afternoon Chair Gennaro and members of the Council, my name is Eunice Ko and I am the Deputy Director at the New York City Environmental Justice Alliance (NYC-EJA). Founded in 1991, NYC-EJA is a non-profit citywide membership network linking 13 grassroots organizations from low-income neighborhoods and communities of color across all the 5 boroughs in their struggle for environmental justice. Over 76% of people living in our members' neighborhoods are BIPOC.

This week, the City is recovering from orange skies, red moons, and choking smoke from the raging Canadian wildfires. With no timely notice and sufficient communications and planning from the City, people noticed they were having trouble breathing, getting headaches, and having other respiratory issues. NYC residents were again largely left on their own and, of course, those most vulnerable like the unhoused and essential workers suffered the most consequences.

A few months ago, an extreme rain event left the BQE closed and flooded along with some buses in some places. We're now heading into summer – one where experts warn could be the hottest for many – where heat waves disproportionately kill Black and Brown New Yorkers and will triple and potentially quadruple by the 2050s according to NPCC. Each summer, an estimated 370 New Yorkers die prematurely because of hot weather in NYC and we can only expect this to increase.¹

The climate crisis is here and we have the NYC Chief Climate Officer reportedly going around saying that the City won't be able to protect and prepare all New Yorkers, as if we should all just accept the fact that it's okay for some people to die from poor planning and government negligence, which reads that the most vulnerable – low income communities and communities of color – will be left to fend for themselves as always as our city gets hotter and wetter.

The sustainability plan is called "PlaNYC: Getting Sustainability Done" – a riff of Mayor Adams' favorite phrase "getting stuff done." There are usually three critical pieces needed to get something done well and for accountability: budget, outcomes, and a timetable with milestones and targets.

¹ [2022 NYC Heat-Related Mortality Report](#)

On the budget, PlaNYC highlighted a lot of commitments that would require state and federal funding to get done. While the City should be “making full use of unprecedented Federal and State funding,” it can’t rely solely on this once-in-a-lifetime funding opportunity to sustain the massive climate and environmental changes and upgrades the City needs to make to our infrastructure, assets, and neighborhoods climate ready. The City needs to leverage this money for sustained action, be self-sufficient, and find new funding streams for projects, policies, and programs that will make our city more sustainable and resilient, prioritizing that investment in EJ communities. There are a few things in PlaNYC that are funded by the City, such as the Climate Strong Communities, but it’s not enough. The City isn’t investing and funding in solutions that will directly reduce the climate risks we face at a scale, urgency, and ambition that is needed. For some other initiatives, there is no identified funding, which raises the question of how we’re going to get a lot of this stuff done. For example, while PlaNYC seems to acknowledge the importance of Local Law 97, we question the seriousness with which the administration is intending to implement the law when there is not enough dedicated funding at the city level to implement this law.

On outcomes, there were a lot of short-term benefits and goals focused on outputs, but no associated outcomes and long-term goals that the City could evaluate and measure progress against. While there was mention of prioritizing EJ communities, it was unclear how, when, and which communities would be prioritized and what the expected outcomes for these communities would be. We know EJ communities are the most vulnerable and at risk to flooding and extreme heat. Yet the plan didn’t connect or state the amount of risk reduction associated with any of the actions or identify the level of scaling of the pilot programs that are needed to meet increasing climate risks.

On the timetable, there was no clear timeline with interim milestones for these short-term actions. More importantly, there was no vision tying together these short-term actions and outputs and no indication of where we’re headed as a city. Climate risks are only increasing and absent a vision and actions that directly address these increasing risks, it will be left up to individual NYers to respond and adapt, which means the most at risk will be even more at risk and those who aren’t will not be as affected, further entrenching the inequities and disparities that low-income communities and communities of color are forced to live with.

There are some things the administration is on the right track for. We appreciate the 30% citywide tree canopy commitment, which NYC-EJA has been pushing for as a Forest for All NYC coalition member. We would like to see this done by 2035, but the plan doesn’t give a target year. Additionally, when you’re cutting agency budgets and breaking your 1% budget promise to the Parks Department, this goal feels meaningless. The low emission zone is a great idea, but would be even better if it were even more ambitious and expanded beyond freight. As of now, the plan describes it as a study and yet another pilot.

There are also a lot of things in this plan that lead me to believe this administration is not serious about addressing climate change. The plan’s reliance on technology for climate solutions and the goal to maximize biogas production through public-private partnerships leaves

the door open for false solutions and the continued use of fossil fuel infrastructure. Technology solutions, such as carbon capture, and anaerobic digestion produce more GHG emissions, particularly methane in the case of anaerobic digestion, which when burned has almost 8-times the damaging effects of carbon dioxide. Expansion of anaerobic digester development at Wastewater Resource Recovery Facilities to generate so-called renewable natural gas is a concerning direction that harms the environmental justice communities nearby by perpetuating greenhouse gas and co-pollutant emissions that causes increased asthma rates and other cardiovascular diseases. These communities are also witnessing increased truck traffic for material transport and increased energy bills, despite utilities piping free natural gas generated by these WWRFs. It is extremely concerning that there was also no mention of Renewable Rikers in this plan and how it fits in a larger vision for restorative justice and resilient renewable energy in this city, given the City is undertaking feasibility studies that are required by the Renewable Rikers Act. Lastly, the plan doesn't address issues related to climate that would significantly impact EJ communities, such as affordable housing and displacement.

The level of ambition in the plan isn't commensurate with the scale of the climate crisis at hand. The things that were couched as ambitious are largely things we could just do today if we had the commitment and political will. The city can't put NYers in a position to respond and adapt to climate change on their own because it will mean that our city and the communities made most vulnerable to climate change will suffer the most.

Brooklyn Movement Center • Brotherhood Sister Sol • Chhaya CDC • Community Voices Heard • El Puente • Good Old Lower East Side (GOLES)
Green Worker Cooperatives • Morningside Heights/West Harlem Sanitation Coalition • Nos Quedamos • Staten Island Urban Center
THE POINT CDC • UPROSE • Youth Ministries for Peace and Justice