Testimony in Opposition to the Rezoning of Industry City, Sunset Park Brooklyn
January 14, 2020

Seventy-Eight years ago, this week, the United States entered World War II after we were attacked at Pearl Harbor. The United States was responding to the threat posed by Nazi Germany and their Japanese allies. In the years that followed that declaration, the Sunset Park community and its Industrial Waterfront was mobilized to address the threats posed by the Axis powers and became a center focused on the production and assemblage of goods and material. During the conflict, the adjacent Brooklyn Army Terminal (situated between 58th and 65th Streets) employed more than 10,000 civilians, handled 43,000,000 tons of material and 39,008,943.82 tons of cargo, and was the point of departure for 3.5 million soldiers.

This week, the World Meteorological Organization, a UN agency reported that by years end this past decade will have been the hottest on record. The report they released this week at the United Nations’ climate conference, predicts that the human-driven increase in temperatures is bringing with it progressively more catastrophic impacts on human health and

“If we do not take urgent climate action now, then we are heading for a temperature increase of more than 3°C by the end of the century, with ever more harmful impacts [–increased heat and rising sea levels - ] on human wellbeing,” ¹

¹ Petteri Taalas, of the UN’s World Meteorologist Organization said in an announcement about this year’s report.
Once again, the Sunset Park waterfront will need to be mobilized -- not to protect the US and its allies abroad-- but to protect our community, country and the planet from the existential threat of climate change. A threat that requires that we harden and adapt our shoreline, modify the way we produce and consume, retrofit our buildings and keep open the water borne options that assure that our supplies of food and water are not interrupted. We need new products and ways of production that are not dependent on over extended means of transport to help adapt to our new climactic conditions.

The GRID plan proposed by UPROSE puts forth such a viable response to the impending climate crisis. The plan promoted by Industry City proposes changes that could harm our city’s and our region’s ability to adopt the changes necessary to address these threat related to climate change and rising sea levels. I am not an alarmist, I am a community-based urban planner that sees the need to immediately initiate a plan to assess and implement what our land use policies should be to avoid a catastrophic future to our city, region and country. This response con not and should not be postponed. We need to make sure that the land needed to carry out these functions are not rezoned and their uses surrendered to today’s perception of highest and best use- one of higher profit margins -- at the cost of being able to meet our future needs.

To quote Industry City’s Environmental Impact Statement, Chapter 22, Irreversible and Irretrievable Commitments of Resources:

“The re-tenanting and redevelopment of Industry City through the Proposed Actions ...constitutes a long-term commitment of land resources, thereby rendering land use for other purposes highly unlikely in the foreseeable future.”

This statement by Industry City recognizes that other land use options are ruled out by their plan, but it barely touches on this potentially significant negative impacts while ignoring some other critically important issues:

1. Industry City itself represents a significant percentage of the remaining industrial space in the city of New York. In the past 20 years, the City has, through rezoning, reduced the land area available to industry (not counting “transitional“ mixed use areas) by a substantial amount.

2. Discernible current resurgence in industrial activity, plus a growing focus on development of the circular economy\(^2\) and its locational dependence on dense urban concentrations, will create

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\(^2\) A circular economy is a regenerative system in which resource input and waste, emission, and energy leakage are minimized by slowing, closing, and narrowing energy and material loops. This can be achieved through long-lasting design, maintenance, repair, reuse, remanufacturing, refurbishing and recycling. A circular economy can reduce greenhouse gas emissions by applying circular principles – notably
a demand for more space serving New York City. The continued conversion of a substantial portion of Industry City to non-industrial uses would remove a meaningful amount of industrial space that cannot be replicated.

- Loss of industrial space will be even greater in the future.
- The pace of conversion from industrial to commercial or housing uses is expected to increase
  - Almost 350 million sq. ft. of industrially zoned land will be underwater by 2100. This translates to 25.9% of the overall manufacturing land in NYC. [See below.]

3. Industry City is NYC’s largest privately-owned industrial complex. The private and public sectors inherently respond differently to marketing, tenanting, background checks, etc. Industrial rents, absent government incentives, do not currently sustain new construction for manufacturing tenants.

4. Most importantly, as stated above, climate change poses an existential threat to the city and especially its shoreline. Waterfront industrial land is needed to protect, adapt, and mitigate the impact of rising sea levels and increased heat. The need for waterfront land dedicated to manufacturing and industrial uses includes;
   - Land to produce/marshal/store materials for such functions as production of emergency housing, inflatable dams, floating docks, green roof systems, etc.
   - Land to marshal materials and equipment for BQE reconstruction.
   - NYC’s percent of industrially zoned “land under water” (within the high-tide mark) will grow and, owing to waterfront location, be subject to and endure frequent flooding.

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re-use, re-manufacturing and re-cycling - to key sectors such as the built environment. Source: the UN Climate Change News, 22 January 2019 “Circular Economy Crucial for Climate Change Goals.
Absent a strategic plan to address land use issues concerning climate change, the city will be inviting irreparable harm to the region. Industrial land and buildings must be saved—once lost they are gone forever.

• A strategic climate adaptation plan based on further study is needed to discern the full impact of the proposed action.

• Mindful that Industry City is NYC’s largest privately-owned industrial holding, and as such is a unique resource, and absent city policies to protect against climate change and to safeguard industry, this project should not proceed.

Until a full plan for addressing the city’s industrial land in the context of climate change, land use pressures, industrial location patterns, etc. a moratorium should be enacted for all development and use changes on waterfront industrial areas.

Today, if given the chance, Sunset Park can once again respond to an existential threat facing our community, country and the planet- the threat of sea level rise and climate change. If we heed the voices of the people of Sunset Park and reject this rezoning and instead adopt the alternative plan before us --the GRID Plan - we can turn this threat into an opportunity – an opportunity that can enable Sunset Park to lead the way to “just transition” to a new sustainable economy. On behalf of our grandchildren, their friends and children from all corners of the planet., I urge you to act now to force the city to address these urgent issues.