



July 15, 2014

To Whom It May Concern:

On behalf of EWVIDCO, I am writing to share our thoughts on the Open Use Study. EWVIDCO is a 35-year old membership organization that provides an array of services to the nearly 1000 industrial businesses in North Brooklyn to grow in order to keep their 11,700 quality blue-collar jobs in our community. This represents 14% of the City's manufacturing employment base. It corresponds with the largest neighborhood in the study, the Newtown Creek area. We appreciate the ambition and goals of the study, but we have concerns.

Recommendation 2 to require all new and existing businesses to meet specific physical design standards could be very problematic when it comes to implementation without any additional provisions. There is a significant risk the cost of doing the necessary work will be so high and have to occur in such a brief interval that businesses would opt to relocate. At least one business owner has told us that if he had to do everything proposed on his own dime, he'd have to shut down, which would mean the loss of at least 50 jobs.

We suggest a long-term phase-in period. This could mean establishing certain minimum checkpoints on an annual basis, adding up to the completed work five or ten years down the road. Or, it could mean giving a longer duration for all the work to be completed, maybe fifteen years. Whatever the case, it is crucial that businesses be given ample time. Therefore, the study should account for an extended and specific timeframe to make the changes so that everyone knows exactly what is expected of them and also feels that it is doable.

We also believe that Recommendation 5 should be strengthened. It is good to offer financial and technical assistance. In order for it to be effective, though, we would like to see more language that makes apparent there will be meaningful funds available to offset the costs of retrofits and some ideas about the source of these funds. The Sales Tax Exemption alone is not sufficient. Nor is upfront education. Businesses will need grants to cover these costs. It is simply untenable for the City to place the entire burden of these significant changes on the businesses and have them fund all of the improvements themselves. Our industrial sector, a critical part of the local economy, will suffer badly.

The firms that will be affected employ a large number of individuals, many of whom are community residents. Our community needs these jobs. Nearly 40% of the industrial workforce lives in the local area. These jobs, on average, pay our residents 73% more than local retail establishments; or \$52,842 vs. \$30,620 annually. Additionally, over 60% of manufacturing jobs offer benefits, compared with 30% of service jobs. Also, these jobs frequently do not require English proficiency or advanced education. Considering 20% of our local residents do not speak English, 31% live at or below the poverty line and nearly 37% of are on some form of



public assistance, these jobs offer the best path to self sufficiency and economic security for our community residents.

Protecting and promoting our industrial sector is crucial to the city's overall economic development. The sector provides close to 500,000 jobs in New York City, making up nearly 15% of the city's workforce, and contributed \$1.7 billion in tax revenues. The manufacturing and industrial sector is not only a strong component of our economy but a reliable source of jobs for many of our fellow New Yorkers. EWVIDCO looks forward to partnering with the Administration, the City Council and other community organizations to make sure that we achieve our shared environmental goals without undermining industrial economic development efforts.

Sincerely,

A handwritten signature in black ink, appearing to read 'Leah', is placed over a light blue rectangular background.

Leah Archibald, Executive Director, EWVIDCO