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**THE COUNCIL  
OF  
THE CITY OF NEW YORK**

**ANTONIO REYNOSO**  
COUNCIL MEMBER, 34<sup>th</sup> DISTRICT, BROOKLYN

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ZONING AND FRANCHISES

City Planning Commission  
22 Reade Street,  
New York, New York, 1007

June 12<sup>th</sup>, 2014

I am writing to voice my support for many of the regulations proposed in the Department of City Planning's Draft Open Industrial Uses Study, as well as to highlight some concerns with the report's methodology. I would like to begin by thanking DCP for focusing their attention on this important environmental issue. For too long, many of the industrial businesses in my district have operated facilities with little in the way of containment measures for harmful and noxious chemicals, particulates, odors, and noise. By implementing further regulations on these businesses, we can ensure that our communities are spared the potentially hazardous effects of living in the vicinity of manufacturing zones and aid in protecting the natural environment surrounding these facilities.

As noted in the draft report, many of the businesses with open industrial uses are located along waterways. By implementing containment measures, the city can ensure that toxic materials are not being carried into our waterways during rain and wind events. I was pleased to see DCP address the breakdown of the buffer zones between manufacturing and residential districts. I am fully supportive of creating new zoning classifications that would allow for mixed-use districts that incorporate light manufacturing with residential uses, to serve as buffers between residential areas and heavier manufacturing districts. I would recommend revisiting the idea of creating Industrial Ombudsmen Areas (IOAs) to assist businesses in mixed use areas. These IOAs should surround, but not encroach upon, the current IBZs.

While I am pleased with many of recommendations proposed in the draft report, I am concerned that the affected businesses have not been engaged in the process. One of the major affected firms my office has been in contact with was unaware that this report even existed. I am a strong believer that residents should not have to choose between quality jobs and a healthy environment; however, it is important to recognize that many of the OIU businesses have been good players within these industries for years and are interested in continuing to collaborate with the City in developing best practices.

As a leader in the effort to protect manufacturing businesses and in my role as Chair of the Committee on Sanitation and Solid Waste Management, I am constantly seeking ways to achieve a balance between economic development and healthy communities for residents. I have found that our office is most successful in achieving this when all stakeholders have a seat at the table. As noted in the draft report, OIU businesses employ an estimated 6,700 individuals, and we must be careful in placing too high of a burden on such an important economic driver. I would encourage DCP to sit down with the advisory panel listed in the draft report and the affected businesses, so that all parties can engage in an open dialogue surrounding these issues. I believe it is also important to distinguish between the different types of open industrial uses. For example, there is the potential for oil runoff associated with auto dismantlers, an issue that may not be shared with a scrap metal processor.

I would like to again state my support for measures that will reduce the environmental hazards present within my community and throughout the city. However, affected businesses should be consulted, and their concerns addressed, prior to any action. My office looks forward to working with DCP, the environmental justice community, and OIU businesses to develop strategies that will simultaneously protect the health of our residents and environment, while spurring economic development. Thank you for your time.

A handwritten signature in black ink, appearing to read 'Antonio Reynoso', with a horizontal line extending to the right from the end of the signature.

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Council Member Antonio Reynoso  
34<sup>th</sup> District  
Williamsburg and Bushwick, Brooklyn  
Ridgewood, Queens