

# **EXHIBIT B**

## STATEMENT OF INTEREST OF PROPOSED AMICI CURIAE

### **New York City Environmental Justice Alliance, Organization United for Trash Reduction & Garbage Equity, International Brotherhood of Teamsters Local 813, and Cleanup North Brooklyn**

**NEW YORK CITY ENVIRONMENTAL JUSTICE ALLIANCE (“NYC-EJA”)** is a non-profit network that has been linking grassroots organizations from low-income neighborhoods and communities of color in their fights for environmental justice since 1991. NYC-EJA empowers its member organizations to advocate for improved environmental conditions and against inequitable environmental burdens by the coordination of campaigns designed to inform and influence City and State policies. NYC-EJA is run by its member organizations, which collaborate on issues common to the organizations and central to NYC-EJA’s mission to advocate against environmental injustice that threatens the ability for low-income communities of color to thrive. Because NYC-EJA is a citywide coalition, its members are uniquely able to identify environmental justice issues or potential policy solutions for many of the City’s communities and nurture a collective voice to mobilize support around these issues or solutions. NYC-EJA members who live and work in the communities Local Law 152 is designed to protect and who have been advocating for waste equity for decades include The POINT CDC, Youth Ministries for Peace and Justice, Nos Quedamos, UPROSE, and El Puente. These organizations and other NYC-EJA members see Local Law 152 as a crucial step towards relieving low-income communities of color of the environmental tragedy thrust upon them by decades of waste being trucked into and processed in their neighborhoods at ever increasing rates.

**ORGANIZATIONS UNITED FOR TRASH REDUCTION AND GARBAGE EQUITY (“O.U.T.R.A.G.E.”)** is an environmental justice coalition of more than two dozen community and civic groups dedicated trash equity and the reduction of waste transfer stations and waste truck traffic in the communities of Williamsburg & Greenpoint in Brooklyn, New York. Since 1991, O.U.T.R.A.G.E. members have been advocating for a more equitable and sustainable solid waste management plan in the City of New York, specifically a plan that reduces the number of waste transfer stations in members’ communities; reduces the capacity at these solid waste transfer stations; and mitigates the dangerous waste truck traffic and pollution these transfer stations invite to their neighborhood streets. The mission of O.U.T.R.A.G.E. is to secure environmental justice for the Williamsburg and Greenpoint communities, where 40% of New York City’s solid waste is currently processed. O.U.T.R.A.G.E. is committed to the principle of fair share, as written into the New York City Charter, and calls for all boroughs to accept their appropriate share of solid waste processing. To meet this mandate, O.U.T.R.A.G.E. works to ensure timely implementation of the 2006 Solid Waste Management Plan. Members of O.U.T.R.A.G.E. are deeply invested in the outcome of this matter as, by enacting Local Law 152, the City has finally followed through with the promises it made in the 2006 SWMP—to prioritize waste equity and reduce capacity in overburdened communities including those were O.U.T.R.A.G.E. members live and work.

**INTERNATIONAL BROTHERHOOD OF TEAMSTERS LOCAL 813 (“Teamsters Local 813”)** was chartered in 1951 by the International Brotherhood of Teamsters covering workers in the Private Sanitation Industry. Today, Teamsters Local 813 supports members in the New York metropolitan area who work in the private sanitation and other industries. Its members share

concerns about increasingly unfair and unsafe labor practices, management abuses, and cutbacks in wages and benefits. The union's sanitation members work in private sanitation, resource recovery, waste transfer station, and recycling station jobs. Because of the labor implications of this matter, Teamsters Local 813 has a substantial interest in its outcome. Local Law 152 incentivizes best practices for recycling and waste processing that will benefit members of Teamsters Local 813. Furthermore, members of Teamsters Local 813 live and work in these overburdened community districts and so have an interest in the reduced truck traffic and reduced air pollution this law provides.

**CLEANUP NORTH BROOKLYN ("CNB")** is a grassroots community organization composed of a diverse mix of residents, including parents, children, artists, manufacturing workers and business owners. CNB advocates for clean air, safe streets and fair employment in North Brooklyn, a neighborhood with mixed residential, industrial, and commercial uses. Central to CNB's mission is an understanding that North Brooklyn is overburdened by poorly managed, privately owned waste transfer stations and concrete mixing plants that pollute and threaten community health. CNB organizes educational efforts to raise awareness of how these private industrial facilities negatively impact North Brooklyn communities. CNB advocates for policy changes that safeguard the health of North Brooklyn residents and allow the neighborhood to once again be a safe place to walk, breathe, and live. Local Law 152 is one such policy as it is targeted at relieving the public health burdens that North Brooklyn residents have shouldered for too long. As such, CNB is deeply concerned about the outcome of this matter.