

July 18, 2019

City Planning Commission
Calendar Information Office
120 Broadway – 31st Floor
New York, NY 10271

Re: Testimony on the Borough-Based Jails – Manhattan

Dear Commissioners,

Please accept this testimony on the Manhattan Borough-Based Jail based on my expertise about Chinatown's food system that has most comprehensively published in my book, *From Farm to Canal Street: Chinatown's Alternative Food Network in the Global Marketplace* (2015, Cornell University Press).

I would like to share one main comment: **the impact of long-term demolition, construction and possible relocation on the provision of fresh fruits and vegetables and resultant food security of residents in Chinatown should be taken into consideration when coming to a decision on the Uniform Land Use Review Procedure and plan for the borough-based jail in Manhattan.**

Disruption of Pedestrian Activity and Transportation due to Construction

One of the unique features of Chinatown's food system is that it is comprised of many small vendors. In the mid-2000s there were 88 vendors clustered along Grand Street, Mott, Mulberry, Canal and Walker Streets in between the subway stations the Grand Street and Canal Street Subway stations. The small scale, no frills vendors keep prices very low.¹ The vendors supply over 100 types of fresh fruits and vegetables, many of which are not sold elsewhere in the city and hold cultural importance to people of East, Southeast, and South Asian descent, as well as African, Afro-Caribbean and Hispanic peoples. Tropical fruits like jackfruit, durian, mangosteen, litchi and longon are highly sought after, as well vegetables such as bitter melon, winter melon, lotus root, chrysanthemum leaves, Malabar spinach, among many other green leafy vegetables in the mustard family Brassicaceae (such as bok choy and its relatives). Residents, tourists, and restaurant owners from the tri-state area make regular trips to Chinatown for culturally appropriate and low-priced foods, sustaining a food industry cluster that supplies 25% of the jobs in Chinatown.²

The dispersal of fresh fruit and vegetable street vendors, storefronts and small grocers ensures access to nutritious, affordable and culturally appropriate foods, contributing to the food security of Chinatown. Food security is considered a basic human right by the United Nations and the 2030 Agenda for Sustainable Development holds to goal to eradicate hunger eradicating hunger.³ Reducing food insecurity is also a tenet of New York City food policy, and Local Law 52 was added in 2011 to require the office of long-term planning and sustainability to prepare and submit an annual city food system metrics report to the mayor and city council speaker regarding the production, processing, distribution and consumption of food in and for the city to enable evidence based decision making.⁴

Distance from consumers to market and income of consumers are key indicators of food security. Since Chinatown is comprised of multiple low-income census tracts, increasing

pedestrian's distance to markets with nutritious food by over 0.5 mile is considered to be detrimental to one's food access and security, and can have detrimental impacts on health.⁵ The proposed jail site is at a distance that is just under 0.5-mile mark from an anchor grocery store on Mott St. Produce vendors on Canal, Centre and Walker Streets have already been disrupted (see below). **Disruption to pedestrian walkways, especially for the elderly, children and other vulnerable populations could increase the distance they must walk for the foods they need, challenging their food access.**

Indirect Business Displacement due to Construction

Since the mid-2000s, there has been a decline in the number of retail and wholesale fresh fruit and vegetable vendors in Chinatown. Increasing rents, property taxes, and compliance pressure exerted by the city's inspectors and police department are potential causes of this change.⁶⁻⁷ From 2004-2019, I have observed that there are 58% fewer produce carts, 33% fewer produce stores, 58% fewer storefront vendors. The bulk of these changes are stores and storefronts along Mott Street and East Broadway, and street vendors on Canal, Walker, and Centre Streets. Coupled with this shift in the retail structure is a shift in the wholesale structure of Chinatown. The multiplicity of small markets used to be supported by eight wholesale produce vendors located in Chinatown who supply then by truck on a regular basis and provide refrigerated storage. Today, only three of these wholesalers remain. Increasing costs of operation and transportation have led to movement of wholesalers to the outer boroughs. **Further disruption to transportation and the pedestrian activity that these businesses rely on may further reduce the heterogeneity in food items, employment in Chinatown's food industry cluster, and attraction of out of neighborhood shoppers to this unique marketplace.**

In summation, changes in pedestrian activity and indirect impacts on business activity could lead to the following:

- *Reduced access to low-cost and nutritious food in Chinatown*
- *Reduced food security for Chinatown and non-Chinatown residents who rely on Chinatown food markets for culturally appropriate foods*

Scientific research has documented the ill environmental, social, and economic effects of a vertically and horizontally integrated food system that we are currently reliant on.⁸⁻¹⁰ Food may cost less than international averages, but Americans are suffering from more diet related diseases like obesity and diabetes because of the lack of wholesome diets. Chinatown has remained immune to these trends for low-income communities in part, because of its decentralized food market structure. New York City has been a leader in sustainability; food access and food security are fundamental parts of any sustainable community.¹¹ I urge you to consider this evidence base in the ULURP and plan for the borough-based jail.

Sincerely,

Valerie Imbruce, PhD
Director, External Scholarships and Undergraduate Research Center
Research Associate, Environmental Studies
Steering Committee Member, Sustainable Communities Transdisciplinary Area of Excellence
Binghamton University

References

1. Kadet, Anne (2016). Why fruits and vegetables are so crazy cheap in Chinatown. June 24, *Wall Street Journal*, access online at: <https://www.wsj.com/articles/why-fruits-and-veggies-are-so-crazy-cheap-in-chinatown-1466762400>
2. McCormick, Lynn, Rui Mao and Yichen Tu (2010). *New York Chinatown's Food-related Cluster*. Hunter College Department of Planning, City University of New York.
3. Food and Agriculture Organization of the United Nations. *Food security and nutrition for all*, access online at: <http://www.fao.org/food-security-and-nutrition-for-all/en/>
4. New York City Food Policy (2018). Food Metrics Report, accessed online at: <https://www1.nyc.gov/site/foodpolicy/index.page>
5. Ver Ploeg, Michele et al. (2009). Access to affordable and nutritious food – Measuring and understanding food deserts and their consequences: Report to Congress. United States Department of Agriculture. Economic Research Service, accessed online at: <https://www.ers.usda.gov/publications/pub-details/?pubid=42729>
6. Hong, Mike (2014). Court to Chinese Vendors: Plead guilty or be deported. May 13, *Voices of NY*, accessed online at: <https://voicesofny.org/2014/05/tues-court-chinese-vendors-plead-guilty-deported/>
7. Perry Abello, Oscar (2019). Why Chinatown is so delicious, and why it might not be so forever. May 16, *Next City*, accessed online at: <https://nextcity.org/daily/entry/why-chinatown-is-so-delicious-and-why-it-might-not-be-so-forever>
8. McMichael, Philip (ed.). 1994. *The Global Restructuring of Agro-Food Systems*. Ithaca: Cornell University Press
9. Friedland, William H. 2004. Agrifood Globalisation and Commodity Systems. *International Journal of Sociology of Agriculture and Food* 12: 5-16.
10. Lyson, Thomas A. and Annalisa Lewis Raymer. 2000. Stalking the Wily Multinational: Power and Control in the U.S. Food System. *Agriculture and Human Values* 17: 199-208.
11. Pamela A. Mischen, George Homsy, Carl P. Lipo, Robert Holahan, Valerie Imbruce, Weixing Zhu, Joseph Graney, Ziang Zhang, Louisa M. Holmes, Manuel Reina (in press) A Foundation for Measuring Community Sustainability. *Sustainability* 2019 11(7), 1903, <https://doi.org/10.3390/su11071903>