

Stamp Exemplifies Environmental Injustice

- [Environmental justice](#) “is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. This goal will be achieved when everyone enjoys the same degree of protection from environmental and health hazards, and equal access to the decision-making process to have a healthy environment in which to live, learn, and work.”
- Environmental injustice typically manifests as the siting of large industrial and commercial development adjacent to historically disempowered communities. The siting of STAMP immediately next to the Tonawanda Seneca Nation exemplifies this pattern.
- Environmental injustice also often manifests as the exclusion of the most impacted people and communities from a meaningful role in the decision-making process about a given project.
- From the beginning, the Nation has had almost no voice in the STAMP process. What little consultation has occurred has focused on mitigation. The environmental injustice of this process is compounded by the violation of sovereignty and legal requirements for consultation with federally recognized Tribal Nations.
- The most intensive manufacturing at STAMP is planned away from the road (to enhance the public-facing visual component). Instead, it is located along the border with the Tonawanda Seneca Nation.
- According to the [New York Climate Leadership and Community Protection Act \(CLCPA\)](#), as of 2020, NY state must ensure that new development projects are aligned with the state’s greenhouse gas emission goals.
- STAMP fails to meet these goals.
- Moreover, Section 7(3) of the CLCPA requires that Disadvantaged Communities (DACs) such as the Tonawanda Seneca Nation should not be subject to a higher burden of greenhouse gasses and other co-pollutants compared to other communities. Pollution emitted by STAMP tenants will violate this legal requirement by disproportionately burdening Tonawanda Seneca Nation residents.
- According to CP-29, the NYDEC Commissioner’s Policy regarding Environmental Justice and Permitting, a potential Environmental Justice Area (PEJA) is a “low income or minority community” that can be adversely affected by a project causing environmental harm. NYDEC has stated to GCEDC, the STAMP project developer, that “the Nation’s reservation is considered a PEJA” - meaning that enhanced public participation in the decision-making process, as well as

consideration of potential harms to the Nation, will be required. However, to date, these requirements have not been met.

- At a moment when we are experiencing unprecedented effects from climate change, the development of heavy industry at the STAMP site represents the opposite of a "[just transition](#)" to a more sustainable economy.