May 18th, 2017

To the New York City Department of City Planning,

The Gowanus Neighborhood Coalition for Justice (GNCJ), is a group of South Brooklyn residents, businesses and community-based organizations that launched in March 2017 to provide a voice to local residents and stakeholders, including low- and moderate-income residents, residents of public housing, and industrial and commercial businesses. GNCJ wants to ensure that the most vulnerable in our community are protected and that the entire community is represented in this planning process.

While we appreciate DCP’s efforts to solicit feedback through working groups, our members have been confronted with barriers that have prevented the full, representative and meaningful participation of our community. The intensive time commitment required to engage in numerous, lengthy meetings is challenging for working families and small business owners and the working group format has not always provided a space for us to voice our concerns and interests outside of the limited scope that NYC DCP has laid out. Additionally, because we have not always seen the feedback we have shared reflected back to us after each meeting, we are submitting this letter to be included in the official record, which outlines our priorities and concerns as articulated in our own words. We specifically request that these concerns be addressed in the working group summit as well as in the PLACES study.

HOUSING PRIORITIES

1. The PLACES study must include strategies for preserving and improving public housing. Commitment to improving NYCHA housing conditions in the three public housing developments in Gowanus must occur before any rezoning is certified whether it is a neighborhood wide rezoning or at the Wyckoff Gardens development. Improving NYCHA housing fundamentally aligns with the Mayor’s goal to preserve 120,000 units of affordable housing citywide. NYCHA residents make up 33% of renters in Gowanus and often live in substandard housing conditions. An inclusive and representative rezoning must include public housing and its residents.

2. The community needs strategies to ensure the development and preservation of housing with deep affordability levels, specifically for households who make less than 40% of the area median income (AMI), or $32,640 annually for a family of three. We want the City to explore other tools and make additional commitments to reach deeper affordability levels in a timely manner for a greater number of units than is currently possible with MIH. We want deeply affordable senior housing as well.

3. Strong anti-displacement measures must be put in place BEFORE a rezoning plan is approved. The Certificate of No Harassment and the Stand for Tenant Safety package of bills before the City Council address issues of harassment, including from demolition or “construction as eviction,” these protections must be in place before a rezoning.

4. We want NYC DCP to address the CEQR’s deficiency to accurately study displacement pressures in the environmental review process. Before doing an environmental impact statement (EIS) for the new Gowanus area wide rezoning or the Wyckoff Gardens rezoning, we want to see a comparison of the projected direct and indirect displacement in the 2003 North Park Slope and the 2007 South Park Slope EIS’ to what has actually occurred.
5. Residents displaced from the community deserve a right to return or a priority in a housing lottery.
Members of our community, mostly low- and moderate-income people of color, have already been displaced in the last 15 years due to poor public policy decisions including land use policies, intense real estate speculation and insufficient tenant protections. Seward Park Urban Renewal Area affordable housing is an example of how to prioritize previously displaced residents within the affordable housing lottery.

6. Enact incentives for 1 to 4 family homeowners to keep rents affordable.
DCP should study and consider policy tools, such as the Good Neighbor Tax Credit, to provide assistance to small homeowners who agree to keep rents low.

INDUSTRIAL AND ECONOMIC DEVELOPMENT

7. Present a list of strategies for preserving and growing industrial and manufacturing businesses.
DCP’s needs to outline a series of policy tools available to protect industry and manufacturing uses both in the industrial business zone (IBZ) and in areas that will potentially see a rezoning to residential or mixed-uses.

8. The Industrial Business Zone (IBZ) must be included in the PLACES study.
We have heard from DCP that the IBZ is ‘off the table’. This is unacceptable. As the industrial areas outside the IBZ change to explicitly allow a wider range of uses, this is bound to impact industries operating within the IBZ, by increasing land values and speculative pressure. DCP must work to ensure that these changes do not negatively impact businesses in the IBZ by including the IBZ in their analysis.

9. Before any zoning occurs that allows for residential uses, we want a zoning that strengthens and protects industrial land use by placing restrictions on hotels, big box retail, self-storage facilities, nightclubs and large footprint offices.
In the event that the pending citywide hotels and self-storage restrictions are not passed in time, DCP must implement local use-restrictions in the IBZ before any rezonings in Gowanus.

10. DCP must study the impacts of increasing the allowable FAR in the Gowanus Manufacturing Zone.
DCP must study the potential impacts of increasing FAR, in exchange for deeded manufacturing space, as a method for preserving and strengthening industrial and manufacturing uses.

11. Require “mandatory mix-use,” to ensure light industry and manufacturing can continue to thrive in Gowanus for new buildings in areas zoned to allow residential and increase density.
New buildings should be required to provide makerspaces or light industrial/manufacturing spaces as a portion of their FAR before any residential FAR can be utilized. This has been proposed by DCP as part of the East Harlem rezoning and the same mechanism should apply here. DCP must ensure enforcement of this mandatory mix-use model.

12. Tie workforce development to the new jobs developed through the immense amount of investment coming into the neighborhood.
The City must commit to targeted workforce development and adult education investments for our community and direct, local hiring practices to ensure that longtime residents with barriers to employment benefit from increased opportunities.
SUSTAINABILITY AND RESILIENCY

13. Environmental justice must be at the center of decision-making with respect to remediation of contaminated sites and implementation of environmental policies.
We want to know how DCP will actively incorporate environmental justice principles into the planning process to ensure low-income people and people of color actively benefit from the increase in neighborhood investment aimed at remediation and sustainability improvements. In its coordination with federal and state agencies the City of New York should abide by relevant federal, state, and city orders, policies and legislations, which consider environmental justice in public decision-making such as Executive Order 12898 and NYSDEC’s Commissioner Policy 29, and Intro 0359A and Intro 0886A.

14. Develop strategies to address Combined Sewage Overflows (CSOs) and urban heat island impacts.
Increased development due to a rezoning cannot result in an increase in CSOs as our local infrastructure is already strained. Additionally, there is a unique opportunity to effectively mitigate the urban heat island effect in Gowanus as part of an area-wide rezoning.

15. We need an emergency preparedness plan to promote resiliency in the event of another natural disaster.
The devastating impacts of Superstorm Sandy in our community, particularly for NYCHA residents at the Gowanus Houses, demonstrate the dire need for a Gowanus neighborhood wide emergency preparedness plan that specifically addresses the needs of low-income residents, seniors, people with disabilities and local businesses.

16. Establish New York City’s First ‘Eco-District’.
As the Mayor knows well, Gowanus is home to New York City’s first U.S. Environmental Protection Agency (EPA) Superfund site, the Gowanus Canal, and to three former Manufactured Gas Plant (MGP) sites as well as a number of other brownfield sites. The City of New York has a unique opportunity to establish New York City’s first ‘Eco-District’ to broadly advance climate adaptation and mitigation measures and equity as highlighted in OneNYC: The Plan for a Strong and Just City.

PUBLIC REALM AND ARTS AND CULTURE

17. Expand and Improve Public Open Space and Parks in Gowanus.
Gowanus is considered an underserved area for Green space. Residents rely on Thomas Greene Playground and the swimming pool as the only open, green space in the immediate area. The loss of this playground and pool as part of the Fulton MGP clean-up, or possible DEP sewage tank siting, will have a detrimental effect on the physical and mental health our community. The City must work to find a replacement for this important open space by insisting on the development of a temporary park and pool nearby, potentially at the Con Edison facility. In addition, new publicly accessible open space must be developed with community input to address the urgent need for green space.

18. Address overcrowding and segregation of our local public schools before any rezoning is approved.
DCP has chosen to postpone conversations around school seats to an unspecified later date and left this very important issue out of the working group meetings. This is unacceptable and before any framework is publicly announced, local parents and students must be meaningfully engaged, and their recommendations incorporated into DCP’s planning efforts.
19. **Improve the surrounding conditions, including better lighting and improved park/greenspace, of NYCHA developments.**

There is an opportunity through this rezoning to improve the parkland and open space on NYCHA properties to ensure that both NYCHA residents and surrounding community members can safely enjoy the public amenities by improving lighting and redesigning public space with input from NYCHA residents and neighbors.

20. **Dedicate funding, possibly from the neighborhood development fund, to reopen the Gowanus Houses Community Center and to preserve and expand accessible arts spaces in the community.**

The Gowanus Houses Center once served as an important cultural resource for NYCHA tenants. Closed for several years prior to Superstorm Sandy due to defunding, during the storm the Center served as a hub for people in desperate need of resources. We believe that this rezoning presents an important opportunity to once again open the Center’s doors and establish it as a much-needed community and cultural space. Additionally, Gowanus is home to many working artists and preserving and expanding affordable space for artists should be an explicit goal of the rezoning.

**OVERARCHING CONCERNS**

21. **Sufficient upfront public investment and forward thinking land use policies must inform any rezonings in Gowanus to ensure that equity and inclusion are the result of any changes made possible by public actions.**

Our community and surrounding neighborhoods have lived through the negative consequences of short sighted and ill-informed public policies and large scale developments which have not brought the promised benefits.

GNCJ believes that inclusive growth that advances economic, social and environmental justice is possible in Gowanus but it requires leadership from Mayor de Blasio, political will and a series of coordinated, intentional and timely public actions, well beyond just land use actions, to ensure that local residents and businesses, who make Gowanus unique, can truly benefit.

Thank you for the opportunity to provide this important feedback and express our concerns. We respectfully request for DCP to respond to each of the demands and concerns in the summary report back scheduled for the fifth working group meetings and in the PLACES study.

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