January 17, 2019

Honorable Bill de Blasio
Mayor
City of New York
City Hall
New York, NY 10007

Marisa Lago
Director
Department of City Planning
120 Broadway, 31st Floor
New York, NY 10007

RE: Gowanus: A Framework for a Sustainable, Inclusive, Mixed-use Neighborhood

Dear Mayor de Blasio and Director Lago:

On behalf of Fifth Avenue Committee (FAC), please accept these comments on the New York City Department of City Planning (DCP) “Gowanus: A Framework for a Sustainable, Inclusive, Mixed-use Neighborhood”.

Gowanus is the first neighborhood to be rezoned by the Administration that can take full advantage of the City’s Mandatory Inclusionary Housing (MIH) policy without public subsidy and where new residential development can lead to an overall increase in the number of low and moderate-income residents without creating significant additional direct displacement pressure on existing low and moderate-income residents. Gowanus also has a significant presence of public housing and industrial businesses, is a coastal community impacted by Superstorm Sandy and home to multiple brownfield sites and the City’s first US EPA Superfund Site.

FAC has been advancing social and economic justice in and around Gowanus, Lower Park Slope and beyond for more than 40 years as a nonprofit comprehensive community development corporation that builds and manages affordable housing, organizes residents and provides a range of tenant advocacy, adult education, workforce development and community services to more than 5,500 low and moderate-income people per year. FAC’s advocacy and organizing for inclusive, sustainable, accountable and equitable land-use and other public policy decisions have informed a number of efforts from anti-redlining and bank re-investment efforts, the redevelopment of the Baltic Street Urban Renewal area in Lower Park Slope, the 2003 and 2007 North and South Park Slope rezonings and the Voluntary and Mandatory Inclusionary Housing and the Certificate of No Harassment policies that came out of the lessons learned from those and other rezonings. Our organizing around the Atlantic Yards project led to greater public accountability including the creation of the Atlantic Yards CDC, funding for tenant anti-displacement work, and commitments around the timing of the creation of the 2,200 units of affordable housing.

FAC has led community development workshops for hundreds of local residents of all backgrounds on zoning, affordable housing, environmental review and climate justice and actively participated in the Bridging Gowanus planning process which helped lay the groundwork for DCP’s work. FAC and our Turning the Tide (T3), climate justice work continues to inform the multiple environmental clean-ups in the neighborhoods, and the siting of combined sewer overflow (CSO) tanks in Gowanus. We’ve also worked with the Urban Land Institute on the report - A Vision for A Greener, Healthier and Cooler Gowanus: Strategies to Mitigate Urban Health Island. Our NYCHA accountability work through Families United for Racial and Economic Equality (FUREE) and other FAC programs and campaigns, fights to preserve NYCHA and improve the quality of life for its residents. Also, as you know, FAC and our partners are developing the single largest new development of permanently affordable housing and public open space in the community – Gowanus Green.
Finally, FAC is leading the Gowanus Neighborhood Coalition for Justice (GNCJ) - a coalition of local public housing and rent stabilized residents, industrial business, civic and nonprofit stakeholders who want to ensure that the land use and public policy decisions impacting the community address the priorities of low and moderate-income residents, industrial firms and community-based organizations and civics that serve, employ and partner with them. GNCJ’s March 2017 report Survive and Thrive: Towards a Justice Focused Neighborhood Plan laid out five overarching principles to be included in land use actions: 1) Advancing racial and economic justice; 2) Creating real affordable housing and protecting tenants from displacement; 3) Promoting environmental justice; 4) Uplifting the culture and community of longtime residents and 5) Protecting local businesses where we work and shop.

The New York City Department of City Planning’s Gowanus framework released in June of 2018 and the associated land use actions will trigger significant new residential and commercial development in Gowanus. While the NYC DCP framework highlights several goals that FAC has been advocating, there remains significant opportunity to improve upon the plan and ensure that the policy actions directly address urgent local needs that promote equity, sustainability and inclusion, especially for populations and sectors that have been negatively impacted by past actions and disinvestment.

Today in Gowanus, we have NYCHA residents living with mold, lead and sewer back-ups; residents who are living without access to heat, hot water, cooking gas or reliable elevators or even reliable water service. It is urgent that the public and private actions in Gowanus invest in preserving and improving public housing and the quality of life for NYCHA residents beyond the 50/50 infill and PACT/RAD proposals for Wyckoff Gardens and Warren Street. NYCHA’s updated physical needs assessments for the three developments in Gowanus alone total $312 million with more than 75% of that currently unfunded. The City must ensure that the rezoning results in local investment in NYCHA and an immediate improvement in the quality of life for the 25% of the Gowanus population that currently lives in public housing. As an active participant and partner in the City’s Where We Live affirmatively furthering fair housing (AFFH) process, we believe that all options to preserve NYCHA and improve the quality of life for its residents should be on the table. One mechanism should be through public value recovery from private development that will occur in Gowanus to help fill a portion of the local NYCHA capital needs gap.

Moreover, the Administration’s recent announcement to sell $1 billion of air rights on NYCHA properties to help address NYCHA’s $32 billion capital needs gap could be applied in Gowanus as part of the larger neighborhood rezoning process to ensure alignment and broad community engagement and that the funds generated go to help fill local NYCHA gaps.

The other area of Gowanus not included in DCP’s June 2018 Framework is the Industrial Business Zone (IBZ). Industrial businesses in Gowanus have been critical locally and city-wide for decades. Industrial and affordable artist uses have increasingly been priced out of the neighborhood in anticipation of the rezoning and due to a broad range of uses being allowed in manufacturing zones including the Industrial Business Zones (IBZ). The City’s recent storage and hotel text amendments are important improvements, but additional use reforms and investments are needed to ensure the diversity of uses and people the city needs and wants can thrive here. Thoughtfully supporting the IBZs and reforming the City’s approach to manufacturing zones overall allows us to balance competing uses intentionally and ensure that the manufacturing zoned land in the City that remains is used for critical services and more job intensive uses, especially ones that are accessible to people with a broad range of educational backgrounds.

It is critical that the IBZ Visioning process that is currently underway in Gowanus be completed prior to the ULURP certification for Gowanus. DCP’s recent North Brooklyn Industry and Innovation Plan and Can Industrial Mixed-Use Buildings Work in NYC reports have several approaches which can and should be applied in Gowanus. Zoning incentives and requirements to promote and ensure the ‘Gowanus Mix’ of light industrial, manufacturing and arts uses compatible with residential development should be applied along with proper enforcement and stewardship mechanisms.

Additionally, through FAC’s Stronger Together initiative with local partners Brooklyn Workforce Innovations (BWI), Southwest Brooklyn Industrial Development Corporation (SBIDC) and Red Hook Initiative (RHI), we know that sustained public investment in adult education, workforce development and bridge programming is critical to address the skills
gap of local residents - especially public housing residents – so they can access family supporting employment opportunities.

Finally, Gowanus represents a tremendous opportunity for the Administration to take a neighborhood scale approach to equity, resilience and climate protection by creating the City’s first Eco-District. The City should dedicate staff to work with FAC and other GNCJ partners to participate in an incubator and meaningfully advance an Eco-District. GNCJ member Gowanus Canal Conservancy (GCC), has laid out several key recommendations to ensure no net increase in stormwater or sewage and improve the public realm in and around the Gowanus Canal. The unique challenges and opportunities of developing along the Canal must be recognized in the zoning framework. Creating and maintaining a vibrant and resilient promenade on private land that is truly public along the length of the Canal that also protects the Canal once it’s cleaned up, will require new zoning requirements and incentives. The Gowanus Lowlands plan, coupled with community wide public realm, open space, public transit and pedestrian improvements, reducing parking requirements, establishing targets around reducing urban heat island, and support for emergency planning, and local energy generation and storage would turn Gowanus’ vulnerabilities into models for other parts of the City.

Most importantly, investments in improving the health and social resilience of residents should be included in a Gowanus Eco-District. Because of the gentrification and displacement that has occurred in and around Gowanus especially over the last decade, the remaining extreme pockets of need are often overlooked. Community Board 6 was not included in the 2018 NYC DOHMH’s Be a Buddy: A Community-Based Climate Resiliency Pilot Project, for instance, despite Red Hook and Gowanus’ Superstorm Sandy experiences that underscored the need for increased social cohesion.

There is an opportunity to fully utilize zoning and other public policy tools to make Gowanus a model of equity, sustainability and inclusion in the fairest big city in the United States. Let’s not let this once in a generation opportunity slip by. We appreciate the opportunity to provide feedback on the Gowanus Framework and look forward to continuing to engage in the planning process as it moves forward.

Sincerely,

Erica Jo-Gilles
Co-Chair

CC:
Councilmember Brad Lander
Councilmember Stephen Levin
Brooklyn Borough President Eric Adams
Deputy Mayor Alicia Glen
Anusha Venkataraman, Senior Advisor to Deputy Mayor
Vincent Sapienza, Commissioner, NYC Department of Environmental Protection
Dan Zarrilli, Chief Resilience Officer, Mayor’s Office
Stanley Brezenoff, Interim Chair NYCHA
Winston Von Engel, Director, Brooklyn Office of Department of City Planning
Members of the NYC City Planning Commission
Sayar Lorial, Community Board 6 Chair
Gowanus Neighborhood Coalition for Justice (GNCJ) members

1 FAC believes that the Gowanus area-wide rezoning would not lead to significant additional direct displacement of low and moderate-income residents because the vast majority of LMI residents have already been displaced due to a combination of past NYC rezonings – in particular of 4th Avenue – and due to loop holes in and weak enforcement of rent stabilization. Over the last 10 years, Community Board 6 lost 31.4% of its rent stabilized housing stock compared to 10.5% citywide. (ANHD – CATH 2018)

2 Public Value Recovery (PVR) is a more apt term that FAC’s partner, the Pratt Center for Community Development, has coined for value capture.