

October 15, 2021

New York City Council Subcommittee on Zoning & Franchises  
Francisco Moya, Chair  
City Hall Park,  
New York, NY 10007  
Via Email: [landusetestimony@council.nyc.gov](mailto:landusetestimony@council.nyc.gov)



RE: Gowanus Neighborhood Plan (C 210177 ZMK, N 210178 ZRK, C 210179 MMK, C 210180 MMK, C 210053 PPK, C 210052 HAK), Gowanus Mercy Home UDAAP (20225005 HAK)  
Gowanus Canal CSO Facility (C 200319 PCK, C 200320 MMK, 200321 PSK, C 180039 MMK)

Dear Councilmember Moya and Members of the Subcommittee on Zoning & Franchises:

Thank you for taking time during Tuesday's public hearing to listen to testimony from the Gowanus Neighborhood Coalition for Justice (GNCJ) and other community stakeholders about the Gowanus area-wide rezoning and other actions in Gowanus. The Gowanus Neighborhood Coalition for Justice (GNCJ)—a racially and socioeconomically diverse coalition of local groups focused on equity, inclusion, economic and environmental sustainability and justice—continues to call on the City to meet our priority demands for the Gowanus Neighborhood Rezoning.

We reiterate that GNCJ will not support the rezoning unless our top 3 demands and multiple priorities are met. Our coalition's full demands are also endorsed by over 1,600 signers via Petition to the City of NY and DCP and can be found online at [www.gncj.org/new-our-advocacy](http://www.gncj.org/new-our-advocacy) and as appendix A to this letter. As many of our Coalition members have testified throughout the ULURP Hearing the City must address our concerns before the final rezoning application is voted on by the Council.

To expound upon our coalition members' testimony on October 12, we submit here as written testimony details regarding GNCJ's demands and priorities and the specific funding and policy commitments we seek from the City. All of these commitments must be transparently reported to a Gowanus Zoning Commitment Task Force to ensure that these commitments identified are met.

The following pages include the full list of GNCJ's demands and priorities with additional details. The attached appendices provide further background detail on specific demands and priorities. The City of New York must include these details in the Points of Agreement and final zoning text and/or map amendments that the City Council will vote on as part of the Gowanus zoning applications referenced above.

Please contact us with any questions and thank you for your time to address our Coalition's concerns.

Sincerely,

[Gowanus Neighborhood Coalition for Justice \(GNCJ\)](#)

Cc: Councilmember Brad Lander, 39th District  
Councilmember Stephen Levin, 33rd District  
Deputy Mayor Vicki Been  
NYC DCP Director Anita Laremont  
Brooklyn Borough President Eric Adams  
NYCHA Chair Greg Russ

Congressmember Nydia Velazquez, 7th District  
Assemblymember Jo Anne Simon, 52nd District  
State Senator Jabari Brisport, 25th District  
City Council candidate Shahana Hanif, 39th District  
City Council candidate Lincoln Restler, 33rd District

Demand	Category of Ask	Ask	Agreement Details
<b>1.) UPFRONT FUNDING FOR FULL CAPITAL NEEDS AT WYCKOFF AND GOWANUS (See Appendix B for the full Physical Needs Assessments (PNA) from NYCHA.)</b>	Capital	\$274M	Full funding and timelines for specific capital repairs, as listed by residents. See Appendix B for the full Physical Needs Assessments (PNA) from NYCHA.
	Expense	\$70,000/year for 15 years for independent TA	Provide Independent technical assistance to local public housing Resident Associations regarding capital repairs related to Gowanus Houses and Wyckoff Gardens.
	Expense/Policy	Assign dedicated NYCHA liaison on capital repairs and Section 3 hiring related to Gowanus and Wyckoff	Fund a NYCHA Liaison to support NYCHA residents in navigating construction processes and holding NYCHA accountable for repairs, tenant rights, Section 3 hiring, and all commitments made through the rezoning.
<b>2.) NET ZERO COMBINED SEWAGE OVERFLOW (CSO) - (See Appendix C for the City Commitments needed to ensure Net Zero CSO Rezoning)</b>	Policy	Enact Stormwater Rule	The Unified Stormwater Rule must be in effect prior to the first site sewer connection in the Rezoning Area
	Policy	Commit to a Gowanus / Redhook Cloudburst Study	Complete a cloudburst study of Gowanus and Red Hook by 2025 with infrastructure recommendations that includes forward looking rain projections in addition to sea level rise, groundwater, and sewer system projections
	Policy	Monitoring effectiveness of Unified Stormwater Rule	Commit to a transparent method of monitoring impacts of new development on CSO, report to Task Force.
	Policy	Update Long-Term Control Plan with updated rainfall data and reassess infrastructure investments in Gowanus by 2023	A commitment to assess future drainage investments in Gowanus as the City develops a new drainage standard, using new rainfall intensity projections that account for climate change in their update of the Long-Term Control Plan by 2023, as outlined in the Mayor's recent weather report.
	Capital	Accelerate 4th Avenue Vision Zero and Stormwater Management	Accelerate stormwater infrastructure investment in 4th Avenue as part of DOT's Vision Zero Plan, which includes green (trees and plantings) and grey (underground retention) infrastructure to address frequent and persistent flooding. Assess opportunity for targeting this corridor as a "Cloudburst Street" in relation to a future Cloudburst Study in the area. This management strategy would include both plantings and underground infrastructure to retain, collect, and transport stormwater during cloudburst wet weather events.

Demand	Category of Ask	Ask	Agreement Details
	Expense/Policy	Conduct outreach and provide grants for retrofits to improve stormwater management on existing buildings	Conduct outreach and provide grants to property owners of existing buildings throughout the neighborhood, particularly 4th Ave and the IBZ, to improve stormwater and sewer management using the revised Green Infrastructure Grant Program, the recently adopted Private Property Retrofit Incentive Program, the recently updated Green Roof Tax Abatement incentive, and HPD's Green Housing Preservation Program (GHPP).
	Expense/Policy	Prioritize impacted buildings for backwater valve installations	As outlined in the Mayor's recent Weather Report, prioritize existing buildings that were impacted by recent storm events in Gowanus for immediate enhancements to household infrastructure as the City begins to study the expansion of backwater valve installations to prevent sewer backups into private properties.
<b>3.) SUPPORT AND FUND A GOWANUS ZONING COMMITMENT TASK FORCE ((See Appendix D for the proposed Gowanus Zoning Commitment Task Force.)</b>	Policy	Create a Gowanus Zoning Commitment Task Force to ensure that commitments identified in the proposed Gowanus Rezoning, FEIS and Neighborhood Plan are met by the City and private developers	The Task Force will collect and organize reporting from responsible agencies on their rezoning commitments, and disseminate the information in a transparent and accessible manner. The Task Force will facilitate productive and respectful engagement between government agencies, development entities and a range of diverse stakeholders in the community, with the aim of raising up voices of those most impacted. (See Appendix D for the proposed Gowanus Zoning Commitment Task Force.)
	Expense	\$70k/per year for 15 years for facilitator	Fund a facilitator for a fifteen-year period to oversee Task Force activities, help to organize and enable Task Force meetings, and otherwise support the Task Force's work.
	Expense	\$70,000/year for 15 years for planning expertise	Commit funding to allow the Task Force to obtain ongoing professional planning expertise for the same period of time, so that the Task Force can obtain, analyze and compile accurate and timely data and assemble them in user friendly language to share with the community.
	Expense/Policy	Assign dedicated senior staff people from DOB, DEP, DPR, SCA, DOT (see NYCHA above) to work with Task Force	Commit senior level staff from agencies, including NYCHA, DOB, DEP, DCP, DPR, SCA, DOT to provide regular reporting to the Task Force to monitor compliance with public and private commitments, adherence to zoning requirements, and implementation of the Rezoning.

Demand	Category of Ask	Ask	Agreement Details
<b>4.) GUARANTEE TIMELY REOPENING AND RENOVATION OF THE GOWANUS COMMUNITY CENTER WITH RESIDENT-LED PROCESS FOR DESIGN, ORGANIZATIONAL STRUCTURE, AND PROGRAMMING</b>	Capital and Expense	Cornerstone contract and commitment to engage local tenants in the programming	Renovation and reopening of the Gowanus and Wyckoff Gardens Community Centers by winter 2023. Ensure new Gowanus Cornerstone contract supports a resident-led process for design, org structure and programming
	Expense	\$150k	Purchase IT equipment to establish computer labs at Gowanus Houses and Wyckoff Gardens Community Centers (note digital literacy instruction below).
<b>5.) INVEST IN COMMUNITY HEALTH &amp; SOCIAL RESILIENCE</b>	Expense	\$XX	Implement NYC's "Cool Neighborhoods Initiative" and "Be A Buddy Program" in Gowanus and Red Hook to address urban heat island and disaster preparedness with focus on vulnerable populations (NYC DOHMH, MOER, etc..) (Also see Urban Land Institute Reports: 1) <a href="#">Vision for a Greener, Healthier, Cooler Gowanus: Strategies to Mitigate Urban Heat Island Effect</a> & 2) <a href="#">Urban Design Climate Workshop: Gowanus, Brooklyn: From Climate Science to Climate Action</a> )
	Expense	\$100,000/yr for 10 years	Fund a community led initiative fostering entrepreneurship, community resiliency and culture while providing fresh produce in an already food insecure area, in which prices will increase.
	Expense	\$XX	Fund the development of a Gowanus Community Emergency Preparedness Plan with coordination with local stakeholders (model is how done in Red Hook - included outside consultants, NYCCEM and local CBOs)
	Expense/Policy	Expand MAP Program to Gowanus	Invest in Anti-Violence Efforts in Gowanus
	Expense	\$250k/yr for 10 years	Expand services to seniors in Gowanus with focus on NYCHA residents and those with disabilities.
	Capital	Accelerate NYCHA Broadband Access for Wyckoff, Warren and Gowanus houses	Ensure Wyckoff, Warren and Gowanus Houses have broadband access by a date certain.
	<b>6.) BUILD ECONOMIC EQUITY ENSURING LOCAL ACCESS TO SECTION 3 EMPLOYMENT</b>	Policy	City to gather information and report out to local taskforce

Demand	Category of Ask	Ask	Agreement Details
<b>7.) INVEST IN KNOW-YOUR-RIGHTS TRAININGS</b>	Expense	\$40k/per year for 5 years if nonprofit provides trainings; or City provides trainings	Funding for know-your-rights trainings, including Affirmatively Furthering Fair Housing, civil rights compliance and other building and tenant related trainings and services to Warren, Wyckoff and Gowanus residents. Expanding Know Your Rights trainings (via HPD / AFFH / NYCHA)
<b>8.) 100% AFFORDABILITY ON PUBLIC LAND</b>	Policy	100% affordable	Already committed through HPD announcement of Gowanus Green and Mercy Housing projects. Reference 100% affordability in the zoning text and UDAAP and POA.
<b>9.) ADDRESS LOCAL SKILLS GAP WITH TARGETED MULTI-YEAR WORKFORCE INVESTMENT</b>	Expense	\$1.5m per year for 10 years	Fund sector based workforce training, bridge programming, adult ed classes, wrap around services and job placement and retention services for CD6, 2 and 7 unemployed and underemployed residents with focus on public housing residents and foreign born NYers. Note Gowanus Racial Equity Report's recommendations.
		\$75k/per year for 10 years	Digital Literacy Instruction - focus on NYCHA residents, immigrants and seniors.
		\$125k/per year for 10 years	Supporting local CB6, 2 and 7 residents connecting to apprenticeship programs
		\$200,000 per year for 10 years	Business training services to local minority and women-owned manufacturers, LMI entrepreneurs, and start-ups to allow them to optimize and grow.
		\$75,000 per year for 10 years	To facilitate enhanced job placement services in Gowanus, particularly for individuals accessing these new training services, we recommend funding the hiring of an additional account manager at Brooklyn's Workforce 1 Industrial & Transportation Career Center.
		\$3.63 million. Total eligible moving costs or up to \$70,000 per business for 50 businesses; 100k-130k estimated administrative costs.	Industrial Business displacement fund.

Demand	Category of Ask	Ask	Agreement Details
<b>10.) STUDY, IMPLEMENT AND ENFORCE TRANSFER OF DEVELOPMENT RIGHTS TO FUND FULL CAPITAL REPAIRS AT, WYCKOFF AND GOWANUS NYCHA DEVELOPMENTS</b>			GNCJ Understands that this demand is presently Out of Scope
<b>11.) CREATE AN AFFORDABLE HOUSING LOTTERY PREFERENCE FOR LOCAL CD6 NYCHA RESIDENTS</b>	Policy	Expand affordable housing lottery preferences.	Create affordable housing lottery preferences for local NYCHA residents, with an increased percentage for people with disabilities as well as ensure the creation of a significant number of affordable units for seniors.
<b>12.) MAP THE MOST AFFORDABLE MIH OPTIONS</b>	Policy	Map MIH Option 3 and Option 1	Mapping MIH Option 3 in addition to MIH Option1
<b>13.) MANDATE DEEPER MIH LEVELS FOR PRIVATE DEVELOPERS</b>	Policy	Commit 600 Section 8 vouchers for existing CB6 and 2 NYCHA residents to be expand affordable lottery eligibility	Commit to 600 Section 8 vouchers for existing CB6 and 2 NYCHA residents so they can move to newly created affordable housing.
	Policy	Institute CONH	Institute Certificate of No Harrassment as part of rezoning for CB6 and CB2
<b>14.) FOLLOW THROUGH WITH IBZ COMMITMENT</b>	Capital	\$5M	Investment in open-access fiber conduit system broadband within the IBZ.
	Policy/Expense	\$XX	DOT should commit to conducting a mobility study of the Gowanus IBZ to consider turning lanes and loading/unloading zones.
<b>15.) CREATE JOBS FOR LOW INCOME CD6 RESIDENTS TO MAINTAIN NEW BUILDINGS AND PUBLIC SPACE</b>	Expense	\$150k/per year for 10 years	Fund local CBOs to recruit local unemployed and underemployed residents to access relevant property management training (i.e. 32BJ)
	Expense	\$150k/per year for 10 years	Fund local CBOs to support green jobs for maintenance of public spaces, including green infrastructure
<b>16.) PRESERVE INDUSTRY AND ART SPACES</b>	Policy	Institute narrower uses as part of Gowanus Mix	Define narrower uses as part of Gowanus mix that serve to preserve industry and art spaces
<b>17.) INVEST IN LOCAL YOUTH EMPLOYMENT</b>	Expense	Double the # of SYEP slots for local NYCHA youth.	Double the # of Summer Youth Employment Program slots to ensure access to youth from NYCHA communities locally.

Demand	Category of Ask	Ask	Agreement Details
<b>18.) INVEST IN PUBLIC SPACE</b>	Policy	City Commits to supporting development of Parks Improvement District	City commits to supporting PID process for Gowanus open spaces.
	Capital	Old Stone House/Washington Park	Commit to investments and timelines for park improvements and new facility
	Capital	Pacific street Library Branch	Commit to investments and timelines for renovations
	Policy	Thomas Greene Park shadow mitigation	Identify ways to reduce shadows on Thomas Greene Park through modified massing on 549 Sackett St, 270 Nevins St, and 495 Sackett St
	Capital	Thomas Greene Park - timeline and public process	Commit to investments and timelines for park improvements in addition to work being done under the Superfund clean-up
	Capital	Head of Canal Park	Commit to investments and timelines for new public space
	Capital	The Salt Lot	Commitments to GCC temporary space and return to the site, timeline and public process for long-term facilities and public space
	Capital	Smith/9th Transit Plaza	Commit to creating public open space on MTA property that connects the Smith/9th Street train station to the waterfront esplanade.
	Capital	Gowanus Underpass	Commit to pedestrian safety and stormwater improvements in the area under the Gowanus Expressway between Court Street and West 9th Street that connects Red Hook and Gowanus.
	Capital	Greenspace on 4th Extension	Commit to investments and timelines for new public space on the DEP property
Capital	Under the Tracks	Commit to investments and timelines for new public space	
Capital	St Mary's Park	Commit to constructing a comfort station.	

**Appendix A**

Full GNCJ Demand List





## Gowanus Neighborhood Coalition for Justice

*Dealbreakers and Priority Demands for the Gowanus Rezoning*

*Last updated October 15, 2021*

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### **If these dealbreaker demands are not fulfilled, GNCJ will not support the rezoning in any form or fashion:**

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- 1. DEALBREAKER: UPFRONT FUNDING FOR FULL CAPITAL NEEDS AT WYCKOFF AND GOWANUS** The City must dedicate enough upfront funding for full capital needs at Wyckoff Gardens and Gowanus Houses. All funding spent to improve Wyckoff Gardens and Gowanus Houses must adhere to HUD Section 3 hiring policies to ensure local NYCHA residents and low-income residents are hired to complete the work.
  - 2. DEALBREAKER: NET ZERO COMBINED SEWAGE OVERFLOW (CSO)** Mandate net zero CSO from new construction created as a result of the rezoning, through the following actions: (1) Accurately model how increased density will increase CSO and impact local hydrology, (2) Require and enforce CSO mitigation in new development and (3) Ensure city investment in infrastructure to completely mitigate any negative hydrological impacts of rezoning.
  - 3. DEALBREAKER: SUPPORT AND FUND A GOWANUS ZONING COMMITMENT TASK FORCE.** The Task Force will monitor compliance with public and private commitments, adherence to zoning requirements, and implementation of the Rezoning. With representation from local organizations, City agencies, and stakeholders, the Task Force will receive quarterly updates from the City and other stakeholders on planning, implementation, and successful completion of commitments, and disseminate this information to the community in a transparent and accessible manner.
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The below demands are priorities for the entire coalition:

- 4. GUARANTEE TIMELY REOPENING AND RENOVATION OF THE GOWANUS COMMUNITY CENTER WITH RESIDENT-LED PROCESS FOR DESIGN, ORGANIZATIONAL STRUCTURE, AND PROGRAMMING** All funding spent to improve local NYCHA developments must adhere to HUD Section 3 hiring policies to ensure Wyckoff Gardens, Warren Street Houses and Gowanus Houses (WWG) residents - especially lower income public housing residents - are hired to complete the work.
- 5. INVEST IN COMMUNITY HEALTH & SOCIAL RESILIENCE** Commit to a comprehensive package of funding to improve Social Resilience and Health outcomes for local public housing residents, by supporting an Environmental Justice and Racial Equity Assessment and fund the implementation of its recommendations to eliminate disparities. Ensure *all* local residents are included in a Community Health Needs Assessment and Community Emergency Preparedness Plan to address local health disparities and disaster risks.
- 6. BUILD ECONOMIC EQUITY ENSURING LOCAL ACCESS TO SECTION 3 EMPLOYMENT** Commit to HUD Section 3, HPD and NYC administrative code compliance and enforcement. Fund the promotion of local residents earning under 80% of Area Median Income applying for training, employment and economic opportunities through Section 3.
- 7. INVEST IN KNOW-YOUR-RIGHTS TRAININGS** The City must provide funding for know-your-rights trainings, including Affirmatively Furthering Fair Housing, civil rights compliance and other building and tenant related trainings and services to Warren, Wyckoff, and Gowanus residents.



## Gowanus Neighborhood Coalition for Justice

*Dealbreakers and Priority Demands for the Gowanus Rezoning*

*Last updated October 15, 2021*

- 8. 100% AFFORDABILITY ON PUBLIC LAND** Require 100% affordability on land owned by the City of New York. The City must provide the necessary subsidies to provide permanent and deeply affordable units for seniors and people with low incomes 0-60% of AMI.
- 9. ADDRESS LOCAL SKILLS GAP WITH TARGETED MULTI-YEAR WORKFORCE INVESTMENT** Programming must include bridge programming, training, and job placement for CD6 residents with barriers to living wage employment with focus on public housing residents and an industrial sector apprenticeship program. Implement through CBOs.
- 10. STUDY, IMPLEMENT AND ENFORCE TRANSFER OF DEVELOPMENT RIGHTS TO FUND FULL CAPITAL REPAIRS AT WYCKOFF AND GOWANUS NYCHA DEVELOPMENTS** The City must comprehensively and transparently examine and permit the purchase and transfer of development rights from Wyckoff Gardens and Gowanus Houses to privately owned parcels within the larger Gowanus area-wide rezoning, not to exceed the density that the City has already proposed in the Draft Scope of Work. Strong and representative local oversight of the generated funds must include Wyckoff Gardens and Gowanus Houses residents.
- 11. CREATE AN AFFORDABLE HOUSING LOTTERY PREFERENCE FOR LOCAL CD6 NYCHA RESIDENTS** The City, through HPD, must make the necessary regulatory and legislative changes to create affordable housing lottery preferences for local NYCHA residents, and an increased percentage for people with disabilities as well as ensure the creation of a significant number of affordable units for seniors. The City must also commit to a significant number of Section 8 vouchers for existing NYCHA residents so they can move to newly created affordable housing. The planned Affirmatively Furthering Fair Housing (AFFH) pilot must be in Gowanus and start as soon as possible.
- 12. MAP THE MOST AFFORDABLE MIH OPTIONS** The City must map ONLY the deepest mandatory inclusionary housing (MIH) options so low-income residents and the local public housing community can afford the new affordable housing. Use existing options: option 1 - 25% of units at 60% of AMI and option 3 - 20% of units at 40% of AMI.
- 13. MANDATE DEEPER MIH LEVELS FOR PRIVATE DEVELOPERS** Developments along the Gowanus Canal must commit to deeper affordability than MIH alone by providing 25% permanently affordable housing at an average of 50% of AMI with 10% at 30% of AMI.
- 14. FOLLOW THROUGH WITH IBZ COMMITMENT** The City must commit to translating the recently released IBZ Vision Plan into a zoning framework that protects existing industrial businesses and helps them stay in the Gowanus IBZ and modernize and expand, while carefully managing competing uses that can impede industrial operations such as large scale entertainment, gyms, big-box retail, and stand-alone office. The City should consider lowering the parking requirements for industrial properties; allowing increased density for the creation of industrial space and production-based uses; maintaining the prohibition on new residential uses, and examining strategies to help businesses reduce emissions.
- 15. CREATE JOBS FOR LOW INCOME LOCAL RESIDENTS TO MAINTAIN NEW BUILDINGS AND PUBLIC SPACE** Leverage both private and public investment in buildings and public spaces to create jobs for low income local residents in new buildings and the public realm by requiring and committing to local CBO partnerships for recruitment, training and hiring.
- 16. PRESERVE INDUSTRY AND ART SPACES** by implementing an incentive of .3 FAR for specific uses groups in Gowanus Mix that are limited to production, repair, and arts uses exclusively. Require public disclosure and transparency in leasing agreements of Gowanus Mix spaces.



## **Gowanus Neighborhood Coalition for Justice**

*Dealbreakers and Priority Demands for the Gowanus Rezoning*

*Last updated October 15, 2021*

**17. INVEST IN LOCAL YOUTH EMPLOYMENT** Fund Summer Youth Employment Program slots to ensure access to youth from WWG communities.

**18. INVEST IN PUBLIC SPACE** Commit to investments and timelines for public realm improvements called out in the Gowanus Lowlands Master Plan and the North Canal Visioning Plan, including Thomas Greene Park, Head of Canal Park, The Salt Lot, NYCHA campuses, Greenspace on 4th Extension, MTA easements, streets, streets ends, and other city owned parcels. Develop all plans with continued public input.

## **Appendix B**

NYCHA Physical Need Assessment (PNA) for Gowanus Houses and Wyckoff Gardens

## Capital Needs over Next 5 Years Gowanus Houses and Wyckoff Gardens

Sources:

PNA = Physical Needs Assessment, January 15, 2021

MOD = Modernization Activities Report for CM Levin, December 2020

	<b>TOTAL</b>	<i>Source</i>
<b>FUNDED - Completed</b>	\$ 29,951,321	MOD
<b>FUNDED - Not Completed</b>	\$ 118,517,108	MOD
<b>UNFUNDED</b>	\$ 273,549,758	PNA
	<b>\$ 422,018,187</b>	

	<b>Gowanus Houses</b>	<b>Wyckoff Gardens</b>	
<b>FUNDED - Completed</b>	\$ 13,178,324	\$ 16,772,997	MOD
IN PROGRESS	\$ 59,541,606		
DESIGN / PLANNING	\$ 38,819,017	\$ 5,665,000	
5-YEAR PLAN	\$ 12,691,485		
DASNY MANAGED	\$ 1,000,000	\$ 800,000	
<b>FUNDED - Not Completed</b>	<b>\$ 112,052,108</b>	<b>\$ 6,465,000</b>	MOD
Apartment	\$ 75,439,909	\$ 38,680,097	
Architectural	\$ 46,888,943	\$ 21,465,353	
Elevators	\$ 20,800,000		
Electrical	\$ 13,073,163	\$ 2,063,481	
Mechanical	\$ 29,572,427	\$ 5,401,715	
Site - Architectural	\$ 8,667,522	\$ 2,831,398	
Site - Electrical	\$ 401,547	\$ 197,954	
Site - Mechanical	\$ 8,066,250		
<b>UNFUNDED</b>	<b>\$ 202,909,761</b>	<b>\$ 70,639,997</b>	PNA

GOWANUS - Physical Needs Assessment (Replace As-Is)

COMPLETED - 5 YEARS						
Project	Fund Code	General Category	Item	Budget		Comp Year
6481	FEDERAL		EXT. RESTORATION & EMERGENCY SHEDS (LOCAL LAW 11)	\$1,389,333		2017
7757	FEDERAL	Architectural	SPRAY FOAM ROOFING SYSTEMS	\$3,039,273		2015
7781	FEDERAL / IRSAND		SECURITY ENHANCEMENTS(CM FEES)	\$61,979		2016
7987	FEDERAL	Architectural	EXTERIOR BRICK REPAIRS (LOCAL LAW 11)	\$2,471,671		2017
7989	FEDERAL	Architectural	BRICKWORK/FAÇADE RESTORATION (LOCAL LAW 11)	\$2,276,347		2016
8033	FEDERAL		EMERGENCY REPAIRS DUE TO HURRICANE SANDY	\$518,599		2015
8424	FEDERAL	Mechanical	REPLACEMENT OF BOILERS STUDY	\$29,550		2019
8966 MF	CITY		FAÇADES (LOCAL LAW 11)	\$1,963,195		2019
9065	IRSAND		SECURITY ENHANCEMENTS	\$128,794		2016
9192	FEDERAL		REPLACEMENT OF UNDERGROUND STEAM DISTRIBUTION SYSTEM	\$31,380		2018
9787 EPC	EPC		LIGHTING	\$1,165,140		2018
10076	IRCAPF		FAÇADE INSPECTION SAFETY PROGRAM	\$103,063		2020
				<b>\$13,178,324</b>		

IN PROGRESS						
Project	Fund Code	General Category	Item	Budget	Construction Start	Anticipated End
E211	FEDERAL		REPAIRS & MITIGATION (SANDY), INCLUDING ROOF REPLACEMENT	\$57,000,000	05/08/17	01/16/21
9789 EPC	EPC	Mechanical	HEATING CONTROLS	\$2,541,606	08/30/19	12/31/20
				<b>\$59,541,606</b>		

DESIGN / PLANNING							
Project	Fund Code	General Category	Item	Phase	Budget	Anticipated Start	Anticipated End
10186	CITY		CCTV/SECURITY	PLANNING	\$150,000	12/09/22	04/01/24
10329	STATE		BOILER REPLACEMENT	DESIGN	\$38,669,017	11/16/21	02/24/24
					<b>\$38,819,017</b>		

5-YEAR PLAN						
Project	Fund Code	General Category	Item	Budget		
8681	CITY		COMMUNITY CENTER RENOVATION	\$4,000,000		2021
10329	FEDERAL	Mechanical	BOILER REPLACEMENT	\$8,399,433		2022
9613	FEDERAL		FIRE ALARM SYSTEM AT THE SENIOR CENTER	\$292,052		2023
				<b>\$12,691,485</b>		

DASNY MANAGED							
Project	Fund Code	General Category	Item	Phase	Budget	Anticipated Start	Anticipated End
D167	CLOSED		CCTV	CLOSED	\$1,000,000	03/02/18	08/17/18
					<b>\$1,000,000</b>		

General Category	Item	Sub-Item	1-5 Year	Add'l Required Total	Notes	
Apartment	Architectural	Bathroom**	\$6,186,515	\$25,695,600	\$52,595,000	
		Kitchen	\$27,667,793	\$0	\$27,667,793	
		Ceiling	\$1,655,293		\$1,655,293	
		Closet	\$259,535		\$259,535	
		Doors	\$7,536,897		\$7,536,897	
		Floor	\$17,298,361		\$17,298,361	
		Wall	\$1,935,881		\$1,935,881	
		<b>Architectural Total</b>		<b>\$62,540,276</b>	<b>\$25,695,600</b>	<b>\$108,948,761</b>
	Electrical	Electrical Panel Board		\$4,344,490		\$4,344,490
		Intercom		\$94,000		\$94,000
		Light Fixtures		\$2,142,847		\$2,142,847
		Smoke Detectors		\$121,192		\$121,192
		<b>Electrical Total</b>		<b>\$6,702,529</b>		<b>\$6,702,529</b>
	Mechanical	Radiator / Convactor / Baseboard		\$6,197,105		\$6,197,105
<b>Mechanical Total</b>			<b>\$6,197,105</b>		<b>\$6,197,105</b>	
<b>Apartment Total</b>			<b>\$75,439,909</b>	<b>\$25,695,600</b>	<b>\$121,848,394</b>	

Why does this need	Architectural	Exterior	Main Doors	\$143,183	\$143,183		
			Roof	\$5,125,669	\$5,125,669	Project in Progress	
		Windows		\$8,292,840	\$28,360,910	1-5 year figure is for windows that need immediate replacement; to replace all windows = \$28,360,910	
			Other	\$8,127,804	\$8,127,804		
			<b>Exterior Total</b>		<b>\$21,689,496</b>	<b>\$41,757,566</b>	
		Interior		\$25,143,785	\$25,143,785		
	<b>Architectural Total</b>		<b>\$46,888,943</b>	<b>\$46,888,943</b>			

<b>Elevators Total</b>			<b>\$20,800,000</b>	<b>\$20,800,000</b>	
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Electrical	Corridor Lighting		\$186,870	\$186,870	
	Emergency Generator Set		\$292,600	\$292,600	
	Exit Lights		\$3,163	\$3,163	
	Grounding System		\$8,547	\$8,547	
	Lighting Explosion Proof Fixtures		\$2,262	\$2,262	
	Lighting - Exterior Security / Riot Lights		\$1,399,515	\$1,399,515	
	Lighting Fixture - Fluorescent		\$962,927	\$962,927	
	Lighting Fixture - HID		\$37,035	\$37,035	
	Lighting Fixture - Incandescent		\$12,900	\$12,900	
	Motor Starter / Contactor		\$34,170	\$34,170	
	Panelboard		\$1,981,942	\$1,981,942	

		Service Switch			\$4,674,230		\$4,674,230	
		Stairhall Lighting			\$58,432		\$58,432	
		Switchboard			\$3,418,571		\$3,418,571	
		<b>Electrical Total</b>			<b>\$13,073,163</b>		<b>\$13,073,163</b>	
Critical for Apartm Critical for Apartm	Mechanical	Air Compressor			\$11,158		\$11,158	
		Air Conditioning			\$12,209		\$12,209	
		Climate Control			\$1,056		\$1,056	
		Domestic Water System**			\$576,000	\$10,617,465	\$11,193,465	
		Drainage / Sewage System**			\$147,541	\$6,101,512	\$6,249,053	
		Garbage Chute			\$12,290		\$12,290	
		Heating			\$14,217,935		\$14,217,935	
		Heating Plant			\$13,336,207		\$13,336,207	Project in Progress
		Interior Compactor			\$1,176,000		\$1,176,000	
		Non Residential Spaces			\$3,410		\$3,410	
		Ventilation			\$78,620		\$78,620	
		<b>Mechanical Total</b>			<b>\$29,572,427</b>		<b>\$29,572,427</b>	
Site - Architectural	Fences				\$3,766,871		\$3,766,871	
	Fixed Equipment				\$34,783		\$34,783	
	Landscaping				\$2,424		\$2,424	
	Paving - Non-Vehicular Area				\$4,085,590		\$4,085,590	
	Paving - Vehicular Area				\$407,099		\$407,099	
	Playgrounds				\$359,911		\$359,911	
	Retaining Walls				\$7,954		\$7,954	
	Site Walls (Not Retaining Walls)				\$2,889		\$2,889	
		<b>Site - Architectural Total</b>			<b>\$8,667,522</b>		<b>\$8,667,522</b>	
Site - Electrical	Lighting				\$401,547		\$401,547	
	<b>Site - Electrical Total</b>				<b>\$401,547</b>		<b>\$401,547</b>	
Site - Mechanical	Exterior Compactor				\$375,000		\$375,000	
	Underground Condensate Return Piping				\$1,462,500		\$1,462,500	
	Underground Hydronic Piping				\$2,835,000		\$2,835,000	
	Underground Natural Gas Piping				\$468,750		\$468,750	
	Underground Steam Piping				\$2,925,000		\$2,925,000	
	<b>Site - Mechanical Total</b>				<b>\$8,066,250</b>		<b>\$8,066,250</b>	
<b>TOTAL</b>					<b>\$202,909,761</b>	<b>\$25,695,600</b>	<b>\$228,605,361</b>	

\*Includes out-year work that, while not part of the 1-5 year scope, should be included to avoid duplication of resources

\*\*Full Bathroom renovation would involve the work in the Bathrooms themselves as well as plumbing work for the Domestic Water System and the Drainage / Sewage System

WYCKOFF - Physical Needs Assessment (Replace As-Is)

COMPLETED - 5 YEARS						
Project	Fund Code	General Category	Item	Budget	Comp Year	
7600	CITY/FEDERAL		EXTERIOR BRICKWORK & ROOFING	\$14,485,958	2016	
7987	FEDERAL		EXTERIOR BRICK REPAIRS (LOCAL LAW 11)	\$17,246	2015	
7988	FEDERAL		EXTERIOR BRICK REPAIRS (LOCAL LAW 11)	\$82,620	2015	
8678	CITY		TODDLERS' PLAY AREA	\$210,431	2019	
9087	RESAND		CM COST DISTRIBUTION FOR SANDY PROJECTS	\$5,124	2018	
9302EPC	EPC		EPC-LIGHTING IMPROVEMENTS AND WATER CONSERVATION	\$700,039	2017	
9411	FRSAND		A/E WORK AND INITIAL ASSESSMENT RELATED TO SANDY PROJECTS	\$5,080	2018	
10192	FEDERAL		ROOF TANK REPLACEMENT	\$1,266,499	2020	
				<b>\$16,772,997</b>		

DESIGN / PROCUREMENT							
Project	Fund Code	General Category	Item	Phase	Budget	Anticipated Start	Anticipated End
9398	CITY		COMMUNITY CENTER RENOVATION	DESIGN	\$4,365,000	10/14/21	01/28/23
9831	STATE		SECURITY LIGHTING	PLANNING	\$1,300,000	5/27/22	11/22/23
					<b>\$5,665,000</b>		

DASNY MANAGED							
Project	Fund Code	General Category	Item	Phase	Budget	Construction Start	Construction End
0319	CLOSED		APPLIANCES INSTALLATION	CLOSED	\$800,000	12/06/18	07/10/19
					<b>\$800,000</b>		

General Category	Item	Sub-Item	1-5 Year	Add'l Required Work*	Total	Notes		
Apartment	Architectural	Bathroom	\$5,279,152	\$9,576,000	\$14,855,152	This does not include the plumbing and chase wall. The total number for chase wall, bathrooms and related work (527 bathrooms) = \$23,715,000.00		
		Kitchen	\$12,789,370	\$0	\$12,789,370			
		Ceiling	\$861,448		\$861,448			
		Doors	\$4,957,320		\$4,957,320			
		Floor	\$9,211,337		\$9,211,337			
		Wall	\$965,103		\$965,103			
		Architectural Total		<b>\$34,063,731</b>	<b>\$9,576,000</b>		<b>\$43,639,731</b>	
		Electrical	Electrical Panel Board		\$128,880			\$128,880
				Intercom	\$226,775			\$226,775
				Light Fixtures	\$785,639			\$785,639
				Smoke Detectors	\$16,200			\$16,200
				Electrical Total			<b>\$1,157,494</b>	
		Mechanical	Radiator / Convector / Baseboard Terminal Unit Steam Trap		\$3,454,597			\$3,454,597
					\$4,275			\$4,275
Mechanical Total		<b>\$3,458,872</b>		<b>\$3,458,872</b>				
Apartment Total			<b>\$38,680,097</b>	<b>\$9,576,000</b>	<b>\$48,256,097</b>			
Architectural	Exterior	Main Doors	\$0		\$0			
		Roof	\$349,224		\$349,224			
		Windows	\$7,267,346		\$7,267,346			
		Other	\$173,787		\$173,787			
		Exterior Total		<b>\$7,790,357</b>		<b>\$7,790,357</b>		
		Interior	\$13,663,461		\$13,663,461			
Structural	\$11,535		\$11,535					
Architectural Total			<b>\$21,465,353</b>		<b>\$21,465,353</b>			
Electrical	Corridor Lighting		\$653,850		\$653,850			
		Emergency Lighting	\$24,121		\$24,121			
		Exit Lights	\$20,926		\$20,926			
		Exit/Emergency Combination	\$4,104		\$4,104			
		Lighting - Exterior Security / Riot Lights	\$390,044		\$390,044			
		Lighting Fixture - Fluorescent	\$247,615		\$247,615			
		Lighting Fixture - HID	\$800		\$800			
		Lighting Fixture - Incandescent	\$61,107		\$61,107			
		Motor Starter / Contactor	\$14,019		\$14,019			
		Panelboard	\$471,163		\$471,163			
		Stairhall Lighting	\$152,392		\$152,392			
		Telephone	\$23,340		\$23,340			
Electrical Total			<b>\$2,063,481</b>		<b>\$2,063,481</b>			
Mechanical	Air Conditioning		\$47,409		\$47,409			
		Climate Control	\$670		\$670			
		Domestic Water System	\$350,436	\$2,522,618	\$2,873,054			
		Drainage / Sewage System	\$29,422	\$3,909,760	\$3,939,182			
		Garbage Chute	\$9,270		\$9,270			
		Heating	\$69,250		\$69,250			
		Heating Plant	\$4,403,845		\$4,403,845			
		Interior Compactor	\$294,000		\$294,000			
		Non Residential Kitchen	\$21,937		\$21,937			
		Non Residential Spaces	\$2,766		\$2,766			
		Standpipe System	\$66,342		\$66,342			
Ventilation	\$106,368		\$106,368					
Mechanical Total			<b>\$5,401,715</b>		<b>\$5,401,715</b>			
Site - Architectural	Fences		\$676,738		\$676,738			
		Fixed Equipment	\$491		\$491			
		Parking Lot	\$1,527,795		\$1,527,795			
		Paving - Non-Vehicular Area	\$231,881		\$231,881			
		Paving - Vehicular Area	\$312,418		\$312,418			
		Retaining Walls	\$3,044		\$3,044			



	Sidewalks & Curb		\$14,879		\$14,879	
	Stairs / Ramps		\$64,153		\$64,153	
Site - Architectural Total			<b>\$2,831,398</b>		<b>\$2,831,398</b>	
					0	
Site - Electrical	Lighting		<b>\$197,954</b>		<b>\$197,954</b>	Project in Progress
Site - Electrical Total			<b>\$197,954</b>		<b>\$197,954</b>	
<b>TOTAL</b>			<b>\$70,639,997</b>	<b>\$9,576,000</b>	<b>\$80,215,997</b>	

\*Includes out-year work that, while not part of the 1-5 year scope, should be included to avoid duplication of resources

\*\*Full Bathroom renovation would involve the work in the Bathrooms themselves as well as plumbing work for the Domestic Water System and the Drainage / Sewage System

## **Appendix C**

City Commitments needed to ensure Net Zero CSO Rezoning



October 8, 2021

## **RE: City Commitments needed to ensure Net Zero CSO Rezoning**

Since the 2018 release of DCP's Gowanus Framework for a Sustainable, Inclusive, Mixed-use Neighborhood, introducing the proposal for a district-wide rezoning of the Gowanus neighborhood, GCC and our partners in the Gowanus Neighborhood Coalition for Justice (GNCJ) have demanded a **Net Zero CSO Rezoning** to ensure future development in the neighborhood does not contribute additional Combined Sewer Overflow (CSO) to the historically burdened and polluted Gowanus Canal. As part of this demand, we have repeatedly requested that the City provide accurate and up-to-date modeling of the sewer system that utilizes best available data to realistically account for the reasonable worst case development scenario and increased precipitation as a result of climate change in order to realistically assess environmental impacts.

In April 2021, DCP released the Draft Environmental Impact Statement (DEIS), where DEP has shown a robust response to this demand, going above and beyond CEQR requirements with a better than Net Zero outcome. The DEIS shows CSO reductions to the Gowanus Canal by 5 million gallons per year *with* the forthcoming Unified Stormwater Rule in place as new development installs stormwater management practices required under the new rule. Absent the new rule, the City concedes that CSO would actually increase by 3 million gallons per year. While we commend DEP for their work on adopting new citywide stormwater policy that will undoubtedly improve stormwater management in the neighborhood and across the City, it is critical to note that the assessment of CSO outcomes are based on complex sewer and stormwater modeling or projections that are only as reliable as the data that informs them. Evaluating these models requires tools and expertise beyond what the average citizen has access to and for this reason, GCC, local elected officials and the Gowanus community have looked to EPA for guidance. In August 2021, EPA's comments on the City's DEIS concluded that they "*cannot assess what the net CSO discharge impacts will be from the proposed rezoning*" due to a number of inconsistencies in the data presented in the DEIS, including the use of outdated rainfall projections that are not representative of expected future climate predictions.

Given EPA's inconclusive assessment of the Gowanus CSO and sewer modeling and the detrimental local impacts of extreme weather caused by recent storms Henri and Ida, the City must provide additional information and take additional responsibility for tracking the net CSO discharge impacts over time in order to fully meet the community's demand. The City acknowledged the need for future study in flood prone neighborhoods just this past Monday, when the Mayor's Office office released a landmark report<sup>1</sup>: *The New Normal: Combatting*

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<sup>1</sup> [The New Normal: Combatting Storm-Related Extreme Weather in NYC \(September 2021\)](#)

*Storm-Related Extreme Weather in New York City*,” committing more than \$2.7 billion to counteract impacts of extreme weather as a result of climate change and calling for accelerated planning to upgrade our City’s sewer system and improve modeling efforts. If the City intends to deliver on it’s promise to ensure the Gowanus Neighborhood Plan provides a just and green neighborhood for all, **we urge the City to commit to the following as Points of Agreement (POA) prior to the approval of the Gowanus Rezoning:**

1. To ensure our demand is met, **the Unified Stormwater Rule must be in effect prior to the first site sewer connection in the Rezoning Area** and the City must provide transparent reporting on implementation as described in #3 below.

2. **The Gowanus neighborhood must be included as one of the 10 neighborhoods that the City advances for its upcoming Cloudburst Study.**

As outlined in the Mayor’s report, DEP will select 10 at-risk neighborhoods for the implementation of a **cloudburst design study** by the end of 2021. We need a firm commitment from the City to identify the Gowanus neighborhood and adjacent drainage areas in the Red Hook Sewershed as one of these areas in order to make good on the *flood resiliency or hydrology study* that the Gowanus community has been asking for for years.

- *Background: A Cloudburst Study* assesses stormwater flow paths based on topography and sub-surface conditions in at-risk areas to identify grey and green infrastructure priorities and capital projects for flood mitigation and stormwater management. It is essentially the *flood resiliency or hydrology study* that the Gowanus community has been asking for for years. It can and should:

- Integrate recent data and high-resolution flood maps developed by the Mayor’s Office of Resiliency as part of the *Stormwater Resiliency Plan* (May 2021)<sup>2</sup>, 311 flood and sewer reports recorded across the neighborhood following extreme weather, and Coastal Flood maps - all of which demonstrate a high-level of extreme flood risk in Gowanus, particularly along 9th Street and along the Bond-Lorraine Sewer Line, which connects the Gowanus Neighborhood to Red Hook and has been identified by DEP as a “Highest Priority” stormwater improvement project.

- Address EPA’s recommendation that the City develop a separate “probability analysis” to study the various impacts of development and the range of potential climate change outcomes.

- Ensure flood resilience measures in the public right-of-way as new development occurs in the Gowanus neighborhood. While the Unified Stormwater Rule aims to improve private on-site stormwater management, there is no plan to address the high-risk flooding that occurs in streets and sidewalks.

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<sup>2</sup> [NYC Stormwater Resiliency Plan \(May 2021\)](#)

- Incorporate impacts of new development as a result of the Gowanus Rezoning
- Be a transparent and inclusive process that incorporates diverse stakeholder input.

3. **DEP must commit to annual monitoring of net changes in sanitary and stormwater loading within the Gowanus Sewershed as mandated by EPA's Executive Administrative Order.**

The City must agree to comply with the monitoring and reporting requirements for *Stormwater Controls* outlined in Paragraph 73c of EPA's Executive Administrative Order (EAO) from March 29, 2021. As per this mandate, the City must commit to annual **monitoring of net changes in sanitary and stormwater loading, to be reported as modeled volumes**, within the Gowanus Sewershed in order to assess incremental impact of sewer hookups and ensure these do not result in a net increase.

- *Background:* The EPA's EAO includes four distinct and separate mandates for monitoring and subsequent reporting of the following: 1) Stormwater Controls; 2) Separated Outfall Treatment Units; 3) CSO Solids; and 4) CSO Tank Operation and Maintenance.
- The City's response to EPA's EAO provides reasoning towards a "sufficient cause for non-compliance" regarding all four monitoring areas. We believe that in most cases the City provides reasonable grounds for this defense. In particular, regarding *CSO Solids*, the City commits to submitting a post-dredging Monitoring Plan to EPA by October 31, 2021 that will outline protocol for assessing CSO recontamination of the Canal consistent with requirements of the EPA Record of Decision (ROD).
- However, the **monitoring area of greatest relevance** to our demand for a *Net Zero CSO Rezoning* pertains to *Stormwater Controls*, outlined in *Paragraph 73c* of the EAO<sup>3</sup>.
  - It is our firm belief that this particular mandate will be essential for validating on-the-ground, incremental impacts of the Unified Stormwater Rule and meeting compliance with the EPA ROD mandate that

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<sup>3</sup>*Paragraph 73c. Stormwater Controls: Beginning upon the Effective Date of this Order, Respondent shall ensure implementation of applicable City regulations for sewer connections (Chapter 31 of Title 15 of the Rules of the City of New York) and stormwater control regulations and standards, as set forth in the ROD, at minimum, and as may be updated in City regulations and guidelines, for project plan approvals within the Gowanus Canal sewershed, to ensure that hazardous substances and solids from additional stormwater and sewage loads do not compromise the effectiveness of the permanent CSO control measures by exceeding their design capacity. See ROD at page 85. When implementing or approving municipal sewer infrastructure upgrades and/or private stormwater controls within the Gowanus Canal sewershed, stormwater shall be separated for discharge to the Gowanus Canal to the maximum extent practicable. Commencing on January 31, 2022, Respondent shall submit to EPA an annual report summarizing the net changes in sanitary and stormwater loadings within the Gowanus Canal sewershed, which shall include but not be limited to, the major project plan approvals for the preceding calendar year. Respondents shall submit the proposed form and contents of the report for EPA approval.*

*“redevelopment projects will need to take mitigation measures to prevent or offset additional sewer loadings.”* Without this tracking, the City cannot confirm that the rezoning will achieve Net Zero CSO.

- The City’s response to the EAO<sup>4</sup> suggests that compliance with this mandate is not feasible, claiming that applications for site sewer connections are *not always implemented* and that *pollutant loadings from sanitary and stormwater flows are best calculated through modeling to be measured on a long-term basis*. This reasoning is not good enough.
  
- *Modeling as Monitoring*: We acknowledge that on-the-ground tracking of sanitary and stormwater flows for every redevelopment site may not be feasible and therefore accept annual modeling of projected sanitary and stormwater flows and/or site-based CSO reduction as a sufficient form of *monitoring* to satisfy this demand.
  - Under requirements for the Unified Stormwater Rule (USWR), applicants applying for their site sewer connection must provide DEP with the project proposed sanitary discharge, proposed development site storm flow, allowable flow from the site and/or the stormwater release rate from the site in accordance with DEP rules.
  - Additionally, applicant sites greater than 20,000 square feet will trigger the USWR Chapter 19.1 requirements. These sites will also be required to submit a Stormwater Management Plan (SMP) containing documentation for all infiltration/retention practices to be implemented on site.
  - Under DEP’s 2021 Green Infrastructure Contingency Plan,<sup>5</sup> the Department provides a methodology for converting green infrastructure practices or “greened acres” to a CSO reduction volume.
  
- The required metrics for a site sewer connection combined with DEP’s updated metric for assessing CSO reduction volume provide sufficient information for satisfying the EPA mandate for an annual report summarizing projected or *modeled* annual net changes and overall CSO reduction. While all site-sewer applicants may not implement projects, a summary of net changes based on the applicant projections would be sufficient for this tracking.

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<sup>4</sup> As part of the application for connection to the City sewer system, an applicant must provide the proposed sanitary discharge, proposed development site storm flow, allowable flow from the site and/or the stormwater release rate from the site in accordance with DEP rules. DEP thus receives information on the projected storm and sanitary flows, as applicable. However, DEP’s approval of a project does not mean that the project will be implemented. Further, pollutant loadings from sanitary and stormwater flows are calculated through modeling, are not expected to change significantly on an annual basis and are better measured on a long-term basis. Thus, DEP believes that beginning in 2023 reporting the number of stormwater management pollution prevention plans for approved and/or completed projects, including the number of post construction management practices triggered by the City’s stormwater regulations, should be sufficient. This clarification was included in the proposed edits conveyed to Mr. Carr on May 4th, but was rejected by EPA.

<sup>5</sup> [DEP Green Infrastructure Contingency Plan \(June 2021\)](#)

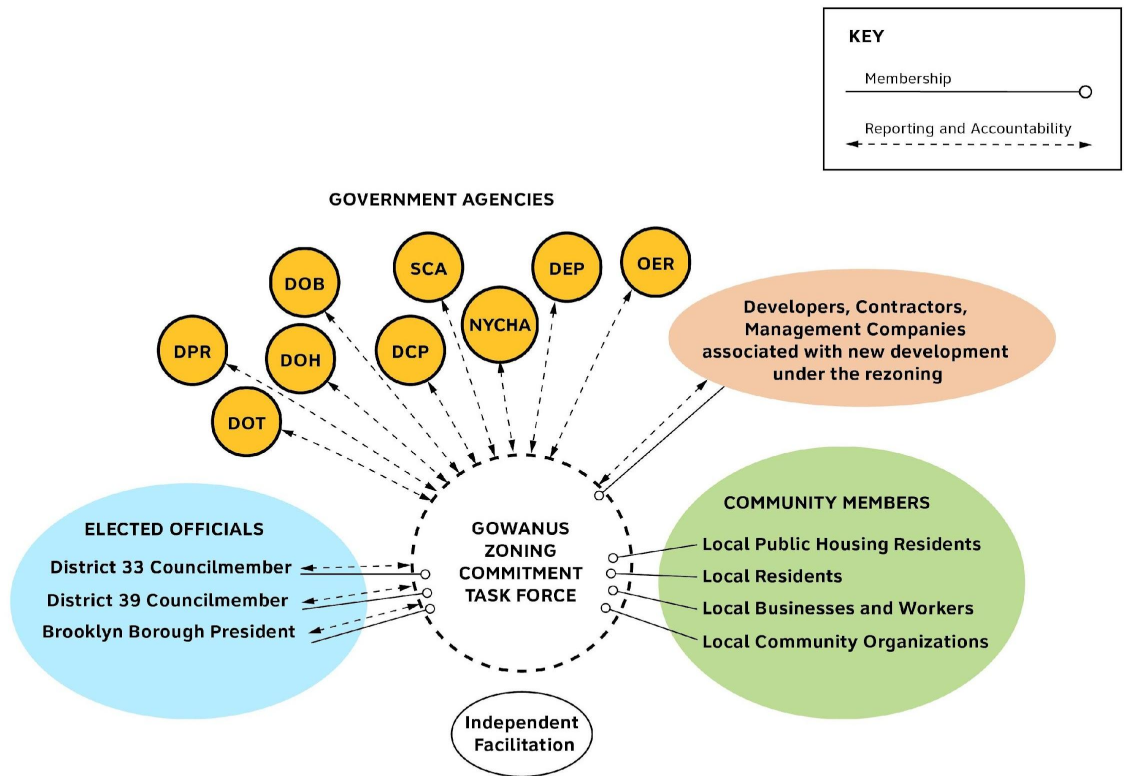
**Appendix D**

Proposed Gowanus Rezoning Task Force Description

# Gowanus Zoning Commitment Task Force

## Mission

The proposed Gowanus Zoning Commitment Task Force will ensure that commitments identified in the proposed Gowanus Rezoning, EIS and Neighborhood Plan are met by the City and private developers. With representation from local organizations, residents and stakeholders, the Task Force will empower the community to hold the City accountable for the Gowanus Neighborhood Plan throughout its execution. The Task Force will collect and organize reporting from responsible agencies on their rezoning commitments, and disseminate the information in a transparent and accessible manner. The Task Force will facilitate productive and respectful engagement between government agencies, development entities and a range of diverse stakeholders in the community, with the aim of raising up voices of those most impacted.



## Why the existing City Commitment Tracker is not sufficient

Pursuant to Local Law 175 of 2016, the City is responsible for publishing a list of capital and programmatic commitments associated with neighborhood-scale rezonings, and an annual progress report detailing the status of each initiative, which it does through the Commitment Tracker. However, this important resource currently operates as a one-way conduit, and does not support the community in understanding or giving feedback on the ongoing status of commitments. Given the scale and complexity of this proposed rezoning, as well as the overlaps with Superfund and other neighborhood remediation activities, we aim to partner with each relevant City Agency as a resource for the community that not only provides up to date information, but also serves as a place and process to register issues, with a governance structure that encourages proactive public-private partnership and accountability around implementation.



## **City Commitments Needed**

1. Fund a facilitator for a fifteen-year period to oversee Task Force activities, help to organize and enable Task Force meetings, and otherwise support the Task Force's work.
2. Fund a NYCHA Liaison to provide technical assistance and support for NYCHA residents in navigating construction processes and holding NYCHA accountable for repairs, tenant rights, Section 3 hiring, and all commitments made through the rezoning.
3. Commit funding to allow the Task Force to obtain ongoing professional planning expertise for the same period of time, so that the Task Force can obtain, analyze and compile accurate and timely data and assemble them in user friendly language to share with the community.
4. Commit senior level staff from agencies below to provide regular reporting to the Task Force to monitor compliance with public and private commitments, adherence to zoning requirements, and implementation of the Rezoning.
  - New York City Housing Authority (NYCHA)
    - Provide regular and transparent updates on all streams of capital funding for Wyckoff Gardens and Gowanus Houses
    - Provide regular, transparent and accessible updates on all construction in Wyckoff Gardens and Gowanus Houses, including progress, timeline, safety procedures, and Section 3 hiring.
  - Department of Buildings (DOB)
    - Provide regular updates on Gowanus Mix leasing
  - Department of Environmental Protection (DEP)
    - Provide regular updates of sewer modeling with new Sewer connection permits and construction status
  - Department of Parks / Department of City Planning
    - Require developers requesting waterfront certification and/or authorization to present site designs and gain approval
  - School Construction Authority
    - Provide regular reports on projected school seats needed for new construction
    - Provide reports on sites requesting school construction bonus
  - Transportation
    - Provide regular reports on local traffic and construction impacts
  - All Agencies with construction commitments.
    - Provide regular reports on progress on all City construction projects in the rezoning area, including DEP tanks, etc.
    - Provide timely response to community concerns