

July 22, 2021

Borough President Eric Adams  
Brooklyn Borough Hall

209 Joralemon Street  
Brooklyn, NY 11201

Via Email: [Askeric@brooklynbp.nyc.gov](mailto:Askeric@brooklynbp.nyc.gov)



Dear Borough President Adams,

Gowanus Neighborhood Coalition for Justice (GNCJ) is a racially and socioeconomically diverse coalition that strives to elevate the voices of our community not yet heard in the City's planning process, seek consensus on community priorities and make the case for a community plan based on principles of social, economic, environmental and racial justice.

As our Coalition members testified at your public hearing on June 30, 2021, GNCJ continues to call on the City to meet our priority demands for the Gowanus Neighborhood Rezoning. Our demands below have been endorsed by over 1,500 signers at [www.change.org/SupportGNCJ](http://www.change.org/SupportGNCJ). This letter reviews our priority demands and both expands on their justification and suggests specific strategies to meet them. The City must provide programmatic commitments and investment for these demands in the Points of Agreement.

If our top three 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.

*In a neighborhood rezoning that claims to address affordable housing issues, the Mayor and his administration provide no real plan for the preservation of the most affordable housing in the Gowanus: public housing. The capital funding gap for local public housing in Gowanus is currently \$237 million, but will continue to rise until the repairs are made.*

*In negotiations over infrastructure investments connected to the Gowanus Neighborhood Rezoning, City Hall recently asked Wyckoff and Gowanus tenants to choose between essential repairs with three funding packages of up to \$52 Million. Our coalition stands with Wyckoff and Gowanus tenants to demand that the City increase its funding offer for long-deferred maintenance and full capital needs at the two NYCHA developments, with a clear scope and schedule for the work. It is unacceptable to ask tenants to choose among these essential elements of NYCHA's basic "warranty of habitability" to the tenants, especially when several of these items are mandated under the City's federal consent decree.*

*Any mechanism to fund the needed repairs at Wyckoff and Gowanus must have clear engagement of and oversight from residents to protect residents from evictions and exposure to hazardous conditions. This should happen through the Gowanus Zoning Commitment Task Force outlined in #3 below.*

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**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.

*Combined Sewage Overflow (CSO) is the greatest source of ongoing pollution to the Gowanus Canal. The overloaded sewer system discharges about 360 million gallons of raw sewage and polluted run-off into the Canal each year. To ensure new development does not increase pollution, we demand a Net Zero CSO rezoning.*

*The environmental impact statement shows an outcome that is better than Net Zero CSO - reducing CSO by 5 million gallons per year **with the forthcoming Unified Stormwater Rule in place**. EPA's July 13th letter to local elected officials refers to a "number of inconsistencies in the presentation of wastewater and stormwater calculations"<sup>1</sup> - these inconsistencies must be addressed by the Final Environmental Impact Statement, and any needed mitigation to ensure that the rezoning does not add CSO must be identified and committed to.*

***Absent this new rule**, the City concedes that CSO would increase by 3 million gallons per year. To ensure our demand is met, the new 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. The impact statement shows a projection based on the reasonable worst case development population, but these numbers are often severely underestimated and we need to see the reality as it plays out on the ground. As new buildings are constructed, the community must have access to reporting that **proves** new development does not add pollution or worsen flooding through a community-based Task Force that holds the City and developers accountable.*

*Finally, the City must anticipate impacts of climate change and acknowledge existing limitations of the sewer system through clear commitments for infrastructure that will address capacity issues. The sewer model in the EIS is a step towards a local hydrology study that the community has been asking for for years but the City must commit to further developing this to identify critical infrastructure needs, including upgrades to the Bond-Lorraine sewer line that connects to Red Hook, additional sewer separation projects, and more green infrastructure throughout the watershed.*

*Furthermore, recent citywide plans that address inland and coastal flooding have identified Gowanus as an area ripe for targeted infrastructure investment that would address deep and contiguous inland flooding. Now is the time to put these plans into action and follow-through on commitments.*

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<sup>1</sup> EPA letter to elected officials Lander, Levin, Simon, Velasquez and Brisport, July 13 2021.

**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.

*Concentrated environmental burdens in Gowanus, including the Superfund, upland brownfields, flooding and combined sewage overflow, heat island impacts, and substandard NYCHA housing, contribute to poor health conditions for vulnerable current and future neighborhood residents, as City mapped Environmental Justice Areas.<sup>2</sup> Consequently, the Task Force should review completion of Gowanus Plan elements through the lens of equity, sustainability, resilience and environmental justice.*

*The Gowanus Rezoning is a massive undertaking, significantly dependent on capital commitments at the City, State and Federal level. No other rezoning plan has the economic complexity and interdependence that Gowanus has. Literally hundreds of millions of dollars will be spent at three levels of government, not to mention by private developers, in the coming 15 years of rezoning. The physical impact of the development on current residents will be substantial. The public services (schools, sanitation, sewers and water, traffic control, open space, public health services, etc.) necessitated by the projected impact of 18,000 additional residents will likewise be costly. This is not the time to end civic engagement - it is the time to solidify transparent public oversight through the Gowanus Zoning Commitment Task Force.*

*To ensure that the Task Force can effectively accomplish its mission, the City must commit to finance the cost of a facilitator for a fifteen-year period. The facilitator will oversee Task Force activities, help to organize and enable Task Force meetings, and otherwise support the Task Force's work. The City must also 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 access independent guidance on land use and planning issues.*

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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.

*The Gowanus Community Center has served an important historical function as a hub for arts and cultural expression, community connection, personal development, economic capacity, and a link to services. Despite two decades of closure due to NYCHA defunding, it continues to serve as a lifeline for resources, relief and recovery, especially in critical moments. Residents have rallied at the center to provide essential needs post-Sandy and during the COVID-19 pandemic, distributing food and providing PPE. For years*

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<sup>2</sup> [Environmental Justice Areas](#)

residents have called for its permanent reopening.

*In January 2019, the City committed to provide \$4 million in funding to fulfill the 2017 Mayoral pledge to renovate and reopen the center. The City must prioritize a timely, community led process for space design, organizational structure, and programming at the center. A resident advisory group is already intact, organizing interim programming and envisioning a center through a community design process. A resident-determined process serves the long term vision of building social cohesion, intergenerational connection, cultural capacity, artistic expression, resident leadership, entrepreneurial incentives, holistic wellness, and creative vision - so that residents can thrive in community, health, economy, education, and personal wellbeing.*

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**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.

*These following assessments are crucial to prioritize public and private commitments that emphasize health co-benefits and address local environmental justice area needs as Community District 6's overall wealth masks the needs that exist within pockets of the community.*

- a. *Leverage the NYC Environmental Justice Policy Bills to have the Environmental Justice Advisory Board<sup>3</sup> and City agencies work with communities in mapped Environmental Justice areas<sup>4</sup> in Gowanus to develop plans to address environmental injustices, including CSO, flooding, urban heat island, emergency preparedness, climate resilience and mold, lead and asbestos and air quality in public housing .*
- b. *Administer a Racial Equity Impact Assessment (REIA), a systematic examination of how different racial and ethnic groups will likely be affected by a proposed action or decision. REIAs are used to minimize unanticipated adverse consequences in a variety of contexts, including the analysis of proposed policies, institutional practices, programs, plans and budgetary decisions. The REIA can be a vital tool for preventing institutional racism and for identifying new options to remedy long-standing inequities. City Council recently voted to require racial impact studies for proposed land use changes.<sup>5</sup>*
- c. *Create a Community Health Needs Assessment (CHNA) identifying the biggest health needs in the community and establishing goals to guide policymakers and community members on how to prioritize based on these health concerns.*

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<sup>3</sup> [NYC Climate Policy and Programs - Environmental Justice in New York City](#)

<sup>4</sup> [DOH Map of Environmental Justice Areas](#)

<sup>5</sup> [3 thoughts on "Council Votes to Make Racial Impact Studies Part of NYC Land Use Process"](#)

- d. *Fund the creation of an Equitable, Community Driven Emergency Preparedness Plan for Gowanus between local stakeholders, partners and agencies. This plan should ensure adequate local emergency response protocols for public housing residents, not only in regards to weather related emergencies, but also for building system heat, water and gas outages that regularly impact local public housing residents.*
- e. *NYCHA should perform lead and mold abatement in local public housing, as well as educate residents on these abatements and release data on the mold busters pilot, building ventilation systems for indoor air quality and lead paint evaluations that NYCHA has conducted at Gowanus Houses and Wyckoff Gardens. Mechanical ventilation systems are also failing to adequately protect residents and there is a need to address these grave inequities to satisfy the appropriate mitigations for the Federal monitorship.*

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**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.

*This demand builds on NYC's agreement to provide prevailing wages in residential buildings (with over 30 units) in rezoned neighborhoods by ensuring that local residents benefit from rezoned developments with newly created, family-supporting employment.*

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**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.

*These trainings should address residents' rights within NYCHA such as succession and permanent exclusion, and keep residents up to date on bigger issues that affect NYCHA, such as the NYCHA 2.0 Blueprint, Sustainability Agenda, or the Rental Assistance Demonstration program. Trainings should be accessible and offered in multiple languages. Trainings should cover topics including: building code, repair and modernization, basic mold and lead remediation protocols.*

*These trainings should be done in partnership with resident leaders, local community groups, and Tenant Associations and be done with the intention of educating local residents with tools to hold NYCHA in compliance with the stipulations of the city's agreement with HUD.*

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**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.

*Any new development on publicly owned land as part of the neighborhood rezoning must be 100% affordable for people across the economic spectrum, including a substantial portion for very low income*

*residents. In addition, the City must guarantee the necessary subsidies to these developments, including Gowanus Green also known as Public Place, to ensure that these deeply affordable resources are available to our lowest income residents including seniors and to future generations.*

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**9. ADDRESS LOCAL SKILLS GAP WITH TARGETED MULTI-YEAR WORKFORCE INVESTMENT** Programming must include bridge programming, training, and summer youth employment and full-time 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.

*No housing is affordable without a living wage job. In order to truly promote affordable housing, workforce development and adult education must be part of the City's strategy. The local Stronger Together effort has provided 1 in 3 working age public housing residents living in poverty in CB6 with proven adult education, workforce training and support to access employment.*

*CD6 public housing residents have specific needs: 52% of residents are not fluent in English, and an average of 46% do not have a high school diploma. Additional support is crucial to help local low-income residents benefit from the growing prosperity in the area. The local industrial business community and the IBZ requires dedicated attention from NYC in order to grow and help public housing residents gain fulfilling, long-term employment. Public housing residents in CD6 are unemployed at a rate of 35%, while the rate of unemployment in NYC has plummeted to 4%.*

*The City should consider and adopt the following as mitigation strategies to encourage equitable economic development and prevent displacement:*

*a. Fund Local CBOs to Address Local Skills Gap Through Proven Multi-year Investment Strategies: Fund at least \$2.5m over 5 years to expand local CBO capacity to have integrated service and bridge programming efforts (adult education, workforce development, contextualized bridge programming, internships, and wrap around services) focused on unemployed/underemployed low and moderate income (LMI) local residents, with focus on public housing residents, to secure family-supporting employment.*

*b. Fund Local CBOs to Address Local Skills Gap through Workforce Development and Training Program, and an Industrial Sector Apprenticeship program as outlined in the Gowanus IBZ vision effort for local LMI CD6 residents, with a focus on public housing residents.*

*c. NYCHA's Office of Resident Economic Empowerment & Sustainability (REES) connects residents to job training programs and hiring events, as well as with jobs on public projects. Gowanus falls under the "Downtown Brooklyn and Red Hook" zone of REES, which has left its coordinator position vacant. NYCHA should commit to filling this position.*

*d. Leverage Private and Public Investment to Create Jobs for Local Residents including Youth: Require local CBO partnership and contracting for local recruitment, training and hiring of local low and moderate-income CD6 residents for maintenance of public open space and construction and maintenance of privately-owned buildings associated with City-sponsored rezoning(s).*

*e. Fund Industrial Training and Job Readiness: Provide \$100,000 annually for 10 years to support industrial job training. This could fund a program similar to SBIDC's Industrial Career Pathways program and BWI's customized training programs. Initial participants could be 18-25 years old from the local community, particularly NYCHA residents.*

*f. Fund Integrated Service Model for Workforce Development and Job Placement: Create a \$250,000 annual ten year fund for an integrated service model for workforce programming in Gowanus, modeled after the Stronger Together collaboration between SBIDC, FAC, and BWI. This collaboration provides workforce development, bridge programming, adult education, and other services to NYCHA residents in Gowanus and Red Hook. This new program should also connect with local employers in the IBZ to facilitate job placement opportunities and tailor trainings to address the skills gap in the IBZ.*

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**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.

*While owners/developers will make millions off of this rezoning, public housing residents will continue to live in terrible housing conditions that impact our health and quality of life - unless the City intervenes. The City must create a Public Value Recovery tool to ensure that private owners/developers who profit from the rezoning give something back locally - to public housing. Though **Mandatory Inclusionary Housing (MIH)** is one kind of public value recovery - developers get more density and make more money in exchange for providing permanently affordable housing - in a high-rent area like Gowanus, GNCJ believes that there is more value **beyond** MIH. More of this value should be recaptured by the City and invested in the **local** public housing developments in Gowanus.*

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**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.

*As part of affirmatively furthering fair housing, the City must go above and beyond to ensure that new MIH housing is accessible to current low-income community residents, especially those with disabilities and seniors. This is especially critical because the majority of the affordable housing created by MIH will remain out of reach for the lowest-income members of our community.*

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**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.

*The City passed its MIH policy in 2015 at the same time as the East New York neighborhood rezoning. The MIH policy guarantees that 20-30% of all new apartments are permanently affordable when there is a certain level of increase in residential development as a result of a land use action.*

*MIH Option 1 and 3 should be mapped as part of the Gowanus rezoning to both ensure more local low and moderate income residents, including seniors and households whose annual income is between 0%-60% of AMI, can benefit from the affordable housing units built via MIH in Gowanus and to allow a greater number of former Gowanus and Lower Park Slope residents, primarily lower income people of color who have been displaced, to qualify for new units.*

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**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.

*The majority of new housing in Gowanus will be created along the Gowanus Canal where the current zoning is Manufacturing. In Gowanus, the residential market is so strong that the proposed market-rate units can support affordability levels deeper than what MIH currently outlines, making it perhaps the first of the PLACES rezonings with the opportunity to create additional affordability on private sites without public subsidy. Our housing crisis dictates this opportunity should not be missed.*

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**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.

*In order to ensure equitable economic development, the City should commit to a series of priority investments in the IBZ and local economy. These include:*

*a. Infrastructure:*

- o A \$5 million investment in an open-access fiber conduit system in the IBZ Vision Study Area to make affordable, high speed internet access available*
- o DOT should commit to conducting a mobility study of 3rd Avenue between 9th Street and Hamilton Avenue/16th Street near the entrance to the Gowanus Expressway. This study should consider turning lanes. Additionally, DOT should provide more flexibility around loading*



requirements by developing “loading and unloading only” and consolidated zones on each block throughout the IBZ with businesses sharing dedicated spots.

- A comprehensive flood resiliency study that examines the local sewer system in relation to coastal and inland flooding in order to identify critical areas of concern for targeted infrastructure improvements and upgrades. This study must go beyond the outdated Gowanus Long-Term Control Plan (LTCP) and anticipate the impacts of climate change and new population density.

b. *Small Business/Entrepreneur Training:*

- Provide \$75,000 annual funding for 10 years for business training services to local minority and women-owned manufacturers, LMI entrepreneurs, start-ups, and Section 3 businesses (ownership over 51% NYCHA residents) to allow them to optimize and grow.

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**15. CREATE JOBS FOR LOW INCOME CD6 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.

*This demand builds on NYC’s agreement to provide prevailing wages in residential buildings (with over 30 units) in rezoned neighborhoods by ensuring that local residents benefit from rezoned developments with newly created, family supporting employment.*

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**16. PRESERVE INDUSTRY AND ART SPACES** by implementing an incentive of .3 FAR for specific use 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.

*DCP’s strategy to preserve a mix of uses in the community fails to provide real protections for these industrial (production/repair) spaces. The current city proposal is weak as developers will only “voluntarily” opt into providing the additional .6 FAR., .3 of which would go to the “Gowanus Mix.” Even if they opt in, without an enforcement mechanism and nonprofit stewardship in place, there is nothing preventing landlords from keeping these spaces vacant and no enforcement mechanism in place to ensure that these spaces are kept for production/repair uses in the Gowanus Mix. We want to see a real opportunity for makers, light manufacturers, and artists to stay and thrive in Gowanus. Stronger protections in the form of a nonprofit stewardship and enforcement mechanisms must be included in the Gowanus Neighborhood Plan.*

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

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**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.

*The Gowanus Neighborhood is lacking in both open space and tree canopy cover. Currently there are just 0.3 acres of open space per 1,000 residents, which is far below the recommended NYC guidelines of 2.5 acres of total open space per 1,000 residents. Beyond that low ratio, very little of the existing open space in the ¼ mile study area is actually in the low-lying area adjacent to the Canal, which is where the existing Environmental Justice community lives. Residents currently rely on Thomas Greene Playground and the swimming pool as the only existing open, green space in the immediate area. But, as the cleanup of the Canal proceeds this green space will be impacted, disproportionately impacting the low-income residents of color who rely on it. One of two Combined Sewer Overflow (CSO) multi-million-gallon retention tanks will be constructed near the Douglass and DeGraw (“Double D”) community swimming pool. Additionally, the remediation of the Fulton Manufactured Gas Plant will impact the Double D Pool and adjacent sites. These disruptions will take Double D Pool and Thomas Greene Park offline for years in a neighborhood with scarce open space and public recreation, just as DCP’s proposal expects to bring at least 18,000 new residents to the neighborhood.*

*The Gowanus rezoning will add critical open space resources to the local neighborhood, including 3.98 acres of public waterfront on privately owned land, 1.48 acres of newly mapped park at Public Place, and over 500 new street trees. However, with the increased population, this increased open space will still be far below the ideal ratio. Of particular concern is a reduction in the active public space ratio, which is critical to supporting a more residential neighborhood. The DEIS shows that this ratio will go from 0.21 acres per to 0.18 acres per 1,000 residents in the ½ mile study area. Additionally, this analysis depends on 8.35 acres of questionable new public spaces: Pacific Park and 625 Fulton Street, both of which lack firm commitments and are at the edges of the ½ mile study area. The recent growth in adjacent neighborhoods has not helped - as the Borough President has noted<sup>6</sup>, the Downtown Brooklyn rezoning underestimated residential population growth, and thus the city did not invest in sufficient community infrastructure, including open space, school seats, libraries and community facilities.*

*There is opportunity to create a comfortable and resilient public realm – including streets, parks & shore public walkways – that is pedestrian friendly and accessible to all residents, in alignment with the [Gowanus Lowlands Master Plan](#) and Urban Land Institute's January 2018 report, [A Vision for a Greener, Healthier and Cooler Gowanus: Strategies to Mitigate Urban Heat Island Effect](#) as well as their [New York District Council and Urban Resilience Program 2019 report on Gowanus](#).*

***The City must provide commitments to create and support more open space in the immediate neighborhood and invest in existing open spaces. This should include the following:***

*a. Invest in the public realm improvements called out in the Gowanus Lowlands Master Plan, including parks, streets, streets ends, NYCHA campuses, MTA easements + other city owned parcels. Develop all plans with continued public input. New park investments should include: Under the Tracks Park on 10th Street, the Transit Plaza at 9th Street and the canal, open space at both CSO tank sites (Head of Canal and Salt Lot), the Greenspace on 4th Extension at the water tunnel site at 4th Avenue and Sackett Street, and the Old Stone House Annex, as well as street ends and bridges.*

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<sup>6</sup> A DECADE LATER IN DOWNTOWN BROOKLYN

*b. Work with the North Canal Visioning Group and with National Grid to fund the full renovation of Thomas Greene Park in the long term and to secure a suitable site for a temporary park and pool nearby during remediation work. The City must allocate resources to fully fund the renovations of Thomas Greene Park, which will only be partially funded through the Superfund clean-up. National Grid is only obligated to restore Thomas Greene Park to its current status under the Superfund clean-up, but the pool area and recreational space need significant upgrades to continue to be a resource for the community. As of yet, the City has not committed specific funding to upgrades that will bring the park up to modern, safe standards with sufficient shade and amenities, but the rezoning provides an opportunity to leverage and secure funds. Of concern, the DEIS shows that new buildings under the rezoning will create shadows that have “a significant impact on the Double D Pool”. To minimize this impact, the City should modify massing for parcels adjacent to the park such that shadows are reduced, and during renovation the City should site the pool where shadows are not an impact. Finally, the temporary park and pool must have comparable ease of access for residents of the area, particularly those in Gowanus Houses and Wyckoff Gardens, and must be open by the time environmental remediation begins at Thomas Greene Park.*

*c. Improve the NYCHA campuses with upgrades, including better lighting and improved park/greenspace. 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.*

*d. Provide greater local oversight of maintenance and programming to ensure public access to the waterfront. Allow and incentivize programmed spaces on the privately-owned, publicly-accessible esplanades. The Waterfront Access Plan must encourage active and comfortable use of the waterfront esplanade, including installation of BBQ areas, play structures, access to the water, bathrooms, and public art.*

Thank you for your time and attention to these important matters.

Sincerely,

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

Cc: Councilmember Brad Lander, 39th District  
Councilmember Stephen Levin, 33rd District  
Deputy Mayor Vicki Been  
NYC DCP Chair Marisa Lago  
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