



SUMMARY OF POSITION on Gowanus Neighborhood Rezoning and Related Actions Draft Scope of Work May 23, 2019

Gowanus Canal Conservancy is the community-based environmental steward for the neighborhood and is leading the Gowanus Lowlands community-based planning process for the public realm, which builds upon existing remediation and planning processes to identify actionable steps towards a vibrant and resilient network of parks and public spaces centered on the Gowanus Canal. We are also a proud member of the Gowanus Neighborhood Coalition for Justice (GNCJ), a diverse coalition of residents and community organizations that advocates for a just, inclusive, and resilient Gowanus neighborhood and planning process.

Through years of planning, we have seen that achieving the community's priorities will require thoughtfully planned density. However, we are concerned that the proposed density has not been planned in concert with critical infrastructure and neighborhood investment. Our comments focus on green and blue infrastructure, but we stand with our partners in demanding that the City provide a clearer road map to reaching all Neighborhood Plan Goals *before* the ULURP clock begins.

Impacts must be studied at appropriate scales with appropriate boundaries.

- The EIS must study water and sewage management at the watershed and CSO-shed scales to accurately measure the impacts and needed mitigation
- It must study the unique socio-economic and health impacts within public housing developments.
- It must study multi-modal transportation issues in conjunction with IBZ planning.
- And it must study all infrastructure needs within the context of recent land use changes and development in Downtown Brooklyn, Atlantic Yards, and 4th Avenue as we share critical infrastructure.

As Gowanus has unique and complex environmental issues, the City should expand the Gowanus Special Mixed-Use District to address sustainability and resiliency goals.

Given the unique geological and hydrological conditions of Gowanus, combined with a concentration of environmental burdens and vulnerable populations, the City should establish an Environmental Special District that requires a district-scale approach to sustainability and environmental justice. In New York City, there are already important precedents that modify development requirements to protect and expand natural features, such as the Special Natural Areas Districts in Staten Island, the Bronx, and Queens. The following requirements should be incorporated into the Gowanus Special District:

Sewage and Stormwater Management - Existing plans for managing combined sewage overflow that are already required under the Superfund Cleanup will still leave us with an estimated 115 million gallons of overflow a year not accounting for additional sewage due to land use changes. The City recently presented an alternative plan to build a tunnel instead of the tanks, but both options leave 8 CSO-sheds unmanaged. This already required infrastructure *cannot* be used as mitigation for additional sewage loading. Mitigation should be integrated into the Environmental Special District in the form of building and landscape requirements, and technical assistance and grant funding be made easily accessible to support implementation.

Groundwater Management - The neighborhood's high groundwater table and numerous underground creeks should be modeled to understand impacts of construction and sea level rise.

The Waterfront - The Waterfront Access Plan is an important step towards promoting resilient and publicly accessible esplanades that support programming, soft edges, water access. For privately-owned public spaces along the waterfront, a mechanism should be created for community oversight of maintenance and programming, in order to ensure public access and enjoyment of use.

A key strategy identified in the Draft Scope to manage flood risk includes a requirement to raise the shoreline to account for future sea level rise. It is essential that new flood-resilience measures allow for positive drainage to the canal to prevent increased flooding for existing low-lying streets and buildings.

Park and Public Spaces – The rezoning must result in investment in public realm improvements as outlined in the Gowanus Lowlands Master Plan, including parks, streets, streets ends, NYCHA campuses, MTA easements + other city owned parcels.

Streetscapes and Transportation - The current Gowanus Special District includes important provisions for active streets but leaves out essential public realm elements for creating a pedestrian-friendly environment. The Special District should be expanded to require green infrastructure and seating and amend tree planting requirements to be site-specific, and existing street safety issues must be addressed.

In order to achieve the stated goals of sustainability and mobility, the City must reinstate the B71 bus and put teeth behind the Transit Easement Zones by allocating funding to make all MTA stations universally accessible and flood-resilient.

Health and Social Resilience – The City must provide critical improvements to indoor living conditions, social resilience, and health outcomes of vulnerable populations, particularly public housing residents.

Community Oversight - The City must create and empower a governing body of community representatives to ensure that Neighborhood Plan goals are met including: construction impact mitigation; developer commitments including brownfield remediation, Gowanus Mix implementation, CSO mitigation; City commitments, and to provide oversight of maintenance and programming of the public realm.