



GCC Testimony on Draft Scope of Work

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 today will 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.

One overarching concern is that impacts 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 Downtown Brooklyn and Atlantic Yards, as we share critical infrastructure.

Another overarching concern - while the City refers to the need for strategic infrastructure and community investments, there is no clear path to achieving them.

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 Gowanus Special District in the form of building and landscape requirements.

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

The current Gowanus Special District includes important provisions for active streets but leaves out essential elements for creating a pedestrian-friendly environment. The Special District should be expanded to require green infrastructure and seating, and existing street safety issues must be addressed.

The Waterfront Access Plan is an important step towards promoting resilient and publicly accessible esplanades that support programming, soft edges, water access. 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.

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.

In order to achieve the stated goals of sustainability and mobility, the City should 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.