



June 11, 2021

TO: Community Board 6 and 2

RE: Gowanus Neighborhood Plan

On behalf of Gowanus Canal Conservancy (GCC), please accept these comments regarding the Gowanus Neighborhood Plan. These comments represent what we have learned to date from the released Zoning Text and Draft Environmental Impact Statement (DEIS) - as we move through this public review process, we will continue to develop and refine our analysis.

We are the lead community-based environmental steward for the neighborhood and are spearheading 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, accessible, and resilient network of parks and public spaces centered on the Gowanus Canal.

We are a proud member of 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. We stand with our partners in the Gowanus Neighborhood Coalition for Justice to demand that the City invest in the full capital needs of Gowanus Houses and Wyckoff Gardens, ensure Net Zero CSO, and establish a community-based Task Force to hold the City and developers accountable for all commitments made through the Gowanus Rezoning. We additionally work closely with and support numerous other organizations, stakeholders, businesses and residents in the Gowanus neighborhood, who have informed the comments below. We firmly believe that robust, comprehensive planning for the future of the neighborhood is contingent on engagement of the people that know it best.

GCC believes that, *if done right*, a district-wide Gowanus rezoning offers an opportunity to make progress towards a more just and sustainable neighborhood. The proposed Waterfront Access Plan and mitigation of CSO through the new Stormwater Rule are good starting points to address "green and blue" concerns, but we withhold our support until we see clear investments and commitments in public spaces and infrastructure that can 1) address longstanding environmental injustices and 2) support a growing population. We outline these needed investments and commitments below:

Parks and Public Space - The City must provide commitments in the Points of Agreement to create and support more open space in the immediate neighborhood and invest in existing open spaces.

Combined Sewer Overflow - The City must provide transparent reporting on implementation of the new Unified Stormwater Rule to ensure that new development does not increase pollution into the Canal.

Long-Term Resiliency - The City must complete a comprehensive hydrological 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.

Parks and Open Space

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.

The lack of mature tree canopy in Gowanus is palpable. In stark contrast from the leafy neighborhoods of Park Slope and Carroll Gardens, the Gowanus neighborhood is a hole in the urban canopy where 35% of the street trees are under six inches in diameter and fewer than 2% are more than 24 inches in diameter. These small trees need protection and stewardship in order to grow large enough to effectively provide shade and mitigate environmental impacts.

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.

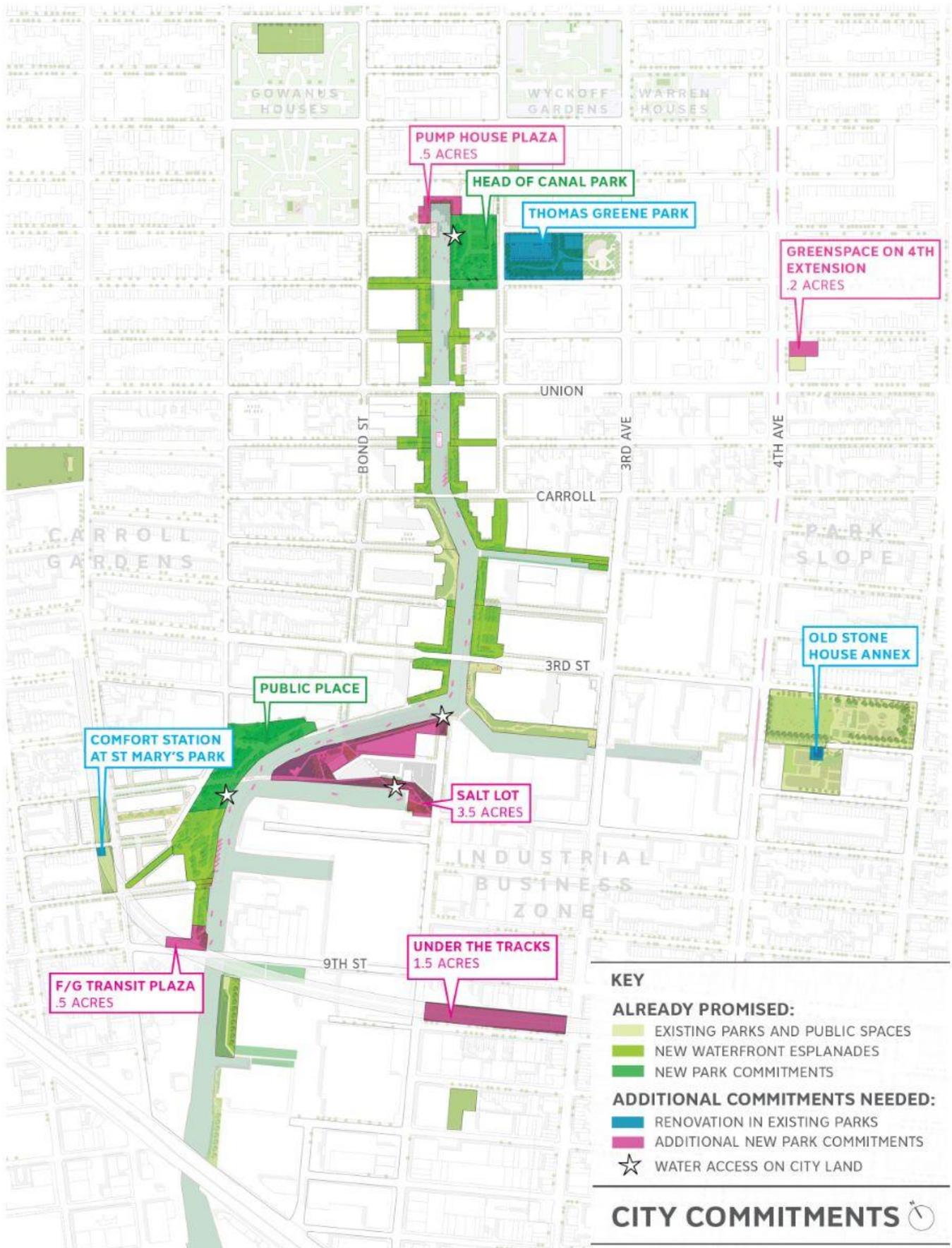
With the increased population, this increased open space will still be far below the ideal ratio. Of particular concern is a reduction in the *active* public space ratio, which is critical to supporting a more residential neighborhood. The DEIS shows that this ratio will go from 0.21 acres per to 0.18 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 proposed Waterfront Access Plan makes strides in advancing many of the community's goals for the waterfront, but the City must implement stronger measures to ensure new esplanades are active, connected, and responsive to community needs.

We have seen too often that rezonings include commitments for open space that are then not met - Gowanus cannot repeat this mistake. The Points of Agreement must include clear timelines and capital funding for all open space commitments. **The City must provide commitments in the Points of Agreement to create and support more open space in the immediate neighborhood and invest in existing open spaces.** This should include the following:

1. Clear capital commitments and timelines for new planned open spaces
2. Additional capital commitments and timelines for open space on approximately 6 acres of City owned land in the neighborhood
3. Renovations and improvements to existing parks to ensure these open spaces can support a growing population
4. Modifications to the Waterfront Access Plan and certification process to better facilitate active uses, water access, and community oversight
5. Facilitation and commitments for water access points along the Gowanus Canal, and
6. Sustainable funding for open space maintenance through the creation of a Parks Improvement District

The following outlines the specific commitments needed in these categories:



1. The City must make capital and timeline commitments for new planned open spaces

The DEIS analysis identifies new public parks that must be completed in order to support the growing population. The City must make the following commitments in the Points of Agreement:

Head of Canal Park (1.6 acres)

This new park is planned for on top of the northern sewage holding tank and the DEIS counts it's 1.6 acres in the Open Space analysis. EPA has recently ordered DEP to complete the tank construction by 2029, but there is not a committed date for the park construction.

- **Commitment Needed:** The City should commit to capital funding and a timeline for completion of the public open space *in addition to* the timeline for completion and operation of the CSO tank.

The DEIS analysis relies on 10% of this public space as *active* uses, which is not reflected in the current design despite a clear interest from the community.

- **Commitment Needed:** The City should increase the amount of active space in the existing site design. The site design must be revised to include at least 10% of the site area as *active* uses that the community has advocated for, including performance areas, a skate park, play areas, and a boat launch.

Gowanus Green (1.5 acres)

- **Commitment Needed:** The City and developer must commit to firm capital and maintenance funding with construction timelines for Gowanus Green park.

2. The City must plan for and commit to capital funding and timelines for open space on up to 5.7 acres of City owned land in the neighborhood

Salt Lot (Mid Canal CSO Tank Site) (up to 3.5 acres)

The Salt Lot is the eco-industrial heart of Gowanus and currently provides critical city infrastructure (salt, sewage, and compost management) as well as a stewardship and education hub. The City will be building a sewage holding tank and new bulkheads on the Salt Lot beginning in 2022. This site will also serve as critical infrastructure in order to reduce CSO into the Gowanus Canal, however, existing uses on the site will be displaced.

- **Commitment Needed:** The Mid Canal CSO tank site should be improved and expanded to accommodate the existing compost facility, native plant nursery, and education and stewardship center as well as provide new public space, large scale salt marsh restoration, and a green business incubator, integrated into the design of the sewage tank.

Transit Plaza at 9th Street (0.5 acres)

The MTA-owned parcel on the northwest corner of the 9th Street Bridge could provide an essential connector to the waterfront.

- **Commitment Needed:** This site should become a public plaza that provides clear and safe access from the shore public walkway to the train entrance, as well as provide shade and seating, bicycle parking, area for food trucks, and a public boathouse.

Fran Brady / Under the Tracks Park (1.5 acres)

Once an active community park, the space underneath the F/G train viaduct along 10th Street has been shuttered since the 1990s when MTA closed it to perform repairs on the viaduct.

- **Commitment Needed:** The space underneath the F/G train viaduct along 10th Street should be repurposed as public space with programming that includes artist residencies in mobile studios, rotating art installations, a maker's market, and a display area for the Kentile Sign and other historic artifacts.

Green Space on 4th Extension (0.2 acres)

Greenspace on 4th, one of the few community gardens in Gowanus, is a welcome respite along busy 4th Avenue. This garden occupies a portion of a much larger lot owned by the City and serves as an access point for a DEP Water Tunnel.

- **Commitment Needed:** The DEP lot adjacent to Greenspace on 4th should be developed into public space, extending the community garden into a larger native plant park with space for gathering, shade, and a composting comfort station. The site should also host an elevator connection to the northbound R Train at Union Street, a much needed accessibility investment for the growing neighborhood.

Pump House Plaza (0.5 acres)

The DEP owned plaza at the head of the Canal is occasionally needed for access to sewer infrastructure, but is generally unoccupied and blocking access around the head of the Canal.

- **Commitment Needed:** The City should open the plaza to the public on a regular basis and invest in an educational space in the Pump House in order to provide educational interpretation of the complex hydrological history and infrastructure in Gowanus, similar to the Visitor Center at the Newtown Creek Wastewater Treatment Plant.

3. The City must commit to renovations and improvements to ensure that existing parks and open spaces can support a growing population

Thomas Greene Park

Under an Administrative Settlement with the EPA, National Grid is required to remediate the western two thirds of Thomas Greene Park, within the footprint of the former Fulton Manufactured Gas Plant site. While National Grid will be required to replace the park in kind, there is a need for additional investment to create an urban park that meets community needs aligned with the Master Plan developed by Friends of Thomas Greene Park and the Lowlands Master Plan. The design should complement and connect to the Head of Canal Park across Nevins Street and design elements should include an expanded pool and pool house, additional plantings, and sports facilities.

- **Commitment Needed:** The City must work closely with National Grid to identify a location for a temporary park and pool during remediation of the park.
- **Commitment Needed:** The City must commit to funding for comprehensive renovation after the remediation is complete in order to augment what National Grid is required to provide.

Furthermore, the DEIS has shown that neighboring development enabled with the rezoning would produce shadows on the existing pool at Thomas Greene Park in May and August, stating that “...in the late afternoon of the May 6/August 6 analysis day, the pools would be mostly or entirely in incremental shadow from approximately 3:45 PM to 6:00 PM when it closes (i.e. 7:00 PM EDT). This extent and duration of new shadow would come at a time of day when temperatures and use of the pool are at their highest and have the potential to affect both the pool’s operation and the user experience. Therefore, a significant impact on the Double D Pool could occur on this analysis day.” [6-12](#). Proposed mitigation for shadows includes “modifications to the height, shape, size, or orientation of proposed developments that cause or contribute to the significant adverse shadow impact.” [21-2](#)

- **Commitment Needed:** The City should model modified massing on 549 Sackett St, 270 Nevins St, and 495 Sackett St to identify ways to reduce shadows on Thomas Greene Park.

As the Thomas Greene Park is renovated, the reconstructed pool should be sited to avoid these shadows. The DEIS notes that “In the spring, summer, and fall, the northern half of the park receives the most sun, and the southeastern corner, the least. Therefore, recreational activities that depend most on sunlight, such as sitting and sunning, or water features such as a pool or sprinklers, would likely be best located in the northern half or central area and not in the southeast corner.” [6-13](#)

- **Commitment Needed:** In the comprehensive renovation, the City should assess siting the pool in the northern half of the park.

St Mary’s Park

The newly constructed St Mary’s Park has provided a much needed place to play in the neighborhood, however, the lack of public restroom facilities is creating a public nuisance.

- **Commitment Needed:** The City must commit to providing a restroom at St. Mary’s Park, ideally a composting bathroom like the Wellhouse Comfort Station in Prospect Park.

Old Stone House & Washington Park

Old Stone House & Washington Park are a historic site and park conservancy that provide interpretation, education programming, community facilities, and park space to the community. The proposed Old Stone House Annex will increase visibility and access, provide educational exhibits, and support additional programming at the site.

- **Commitment Needed:** The City must commit to capital funding for the Old Stone House Annex at Washington Park.

Local Public Housing Campuses

- **Commitment Needed:** GOWANUS HOUSES CAMPUS - The City should invest in improvements to the campus with input from residents. Recommended improvements include community maintenance of gardens and green infrastructure, an accessible green roof pilot, Community Center entrance garden and backyard improvements, lighting enhancements, BBQ areas, and seating.
- **Commitment Needed:** WYCKOFF GARDENS CAMPUS - The City should invest in improvements to the campus with input from residents. Recommended improvements include community

maintenance of gardens and green infrastructure, an accessible green roof pilot, and Community Center entrance garden improvements and lighting enhancements.

- The DEIS cites the potential of investing in active spaces on local public housing campuses as a potential mitigation for the active open space deficiency. If these spaces are invested in, the capital funds cannot be used to scale down the \$274 million commitment that is needed for capital repairs in the buildings.

4. The City must make modifications to the proposed Waterfront Access Plan and the Waterfront Certification process

Under existing zoning, most new development on the NYC waterfront is required to build and maintain public space along the water. Development of waterfront parcels in the Gowanus rezoning area will result in an estimated 4 acres of new public waterfront parks governed by the proposed Gowanus Waterfront Access Plan (WAP).

- **Commitment Needed:** While the proposed WAP makes strides in advancing some of the community's goals, **the City must implement stronger measures to ensure new esplanades include at least 50% active program spaces, such as boat docks, playgrounds, and BBQs** - not just the passive waterfronts that often result from waterfront zoning.
- **Commitment Needed:** **At a minimum, the City should commit to providing boat access or emergency egress from the water between each bridge along the canal** by providing city capital commitments for access at street ends and by designating required boat access locations for private properties in the WAP.
- **Commitment Needed:** **The City must commit to adapt the waterfront certification process in order to give the community a voice in the design of the public spaces built on each property along the waterfront.** This oversight should be nested in a community-based Task Force, an oversight body that both CB6 and GNCJ have called for.
- **Commitment Needed:** **The WAP should facilitate additional pedestrian bridge crossings where access is needed, including at the First Street Turning Basin, Degraw Street, and between Gowanus Green and the Salt Lot**
- **Commitment Needed:** The current plan does not include any provision that requires, facilitates, or funds community-driven programming in privately-owned public spaces. **The City must commit to working with local stakeholders on the creation of a Parks Improvement District** that would levy a tax assessment on new development to support cohesive programming and maintenance of the public realm.

5. The City must facilitate and commit to water access points along the Gowanus Canal

When defending the low active space ratio, the DEIS refers to the Gowanus Canal as “an active open space resource for kayaking and other water-dependent activities” and states that this is “expected to increase as accessibility and water quality improves over the analysis period, further enhancing the quality and availability of open space resources in the study area.” The City cannot sit back and “expect” this increase - they must plan for it, through a combination of commitments on publicly owned land and clear pathways for encouraging private owners to install water access. In order to best integrate equitable access along the Canal:

- **Commitment Needed:** The City must commit to including water access in the design of the Head of Canal Park, the Salt Lot and Gowanus Green.
- **Commitment Needed:** The City must identify ideal locations for water access in the Waterfront Access Plan that are in line with the following principles:
 - There should be at least one emergency egress point between each bridge, striving for even distribution on both sides of the Canal.
 - In order to allow ADA accessibility while not taking up too much space on the narrow Canal, ADA launches should be located in turning basins and at the head of the Canal.

6. The City must facilitate sustainable long term management of parks and public spaces

With significant cuts in the New York City general budget, including a 14% decrease for the Department of Parks & Recreation this fiscal year, maintenance funding for new parks is not a given. The Gowanus neighborhood presents an opportunity to plan for this funding upfront, before new parks are created.

Under waterfront zoning regulations, new development along the waterfront will be required to construct and maintain publicly accessible esplanades but there is no mandate to provide programming or community engagement. The Street Tree Planting requirement will bring an estimated 500 new street trees to the neighborhood with no plan or funding for maintenance - a critical component of young tree survival. Additionally, the proposed City-owned public spaces, including one at Public Place, lack funding for maintenance and programming entirely.

- **Commitment Needed:** The City must work with local stakeholders on the creation of a Parks Improvement District to ensure sufficient, cohesive maintenance and programming across existing and future parks and public spaces in Gowanus.

7. The City must ensure Net Zero Combined Sewer Overflow and provide transparent reporting on implementation of the new stormwater rule to ensure new development does not increase pollution into the Canal

The DEIS shows that the City has met our Net Zero CSO demand with DEP's proposed new Unified Stormwater Rule in place. Under this scenario, new development would not increase pollution into the Canal. However, the City still must commit to invest in infrastructure that will address significant existing system capacity issues that cause street flooding, provide transparent reporting on implementation of the new stormwater rule, and complete a comprehensive hydrology study that anticipates the impacts of climate change.

Combined Sewage Overflow (CSO) is the greatest source of ongoing pollution to the Gowanus Canal. The overloaded sewer system currently discharges about 363 million gallons of raw sewage and polluted run-off into the Canal each year. While planned grey and green infrastructure investments, including the proposed CSO Facilities required under the Superfund process, will improve water quality in the Canal, they do not fully address CSO. Once these projects are complete, there will still be about 115 million gallons of annual CSO discharge left unmanaged under existing conditions.

To ensure new development does not increase pollution to the Gowanus Canal, Gowanus Canal Conservancy and our partners in the Gowanus Neighborhood Coalition for Justice (GNCJ) have demanded a Net Zero CSO rezoning.

With the forthcoming Unified Stormwater Rule in place, NYCDEP's modeling results presented in the DEIS show an outcome that is better than Net Zero CSO - reducing overall CSO volumes to the Gowanus Canal by 5 million gallons per year (MGY). The new rule is slated to be in effect by 2022 and the City concedes that absent the new rule, CSO volumes to the Gowanus Canal would increase by 3 million gallons per year (MGY). To ensure that Net Zero CSO is met, it is imperative that the new rule be in effect prior to the issuance of first site sewer connection permit in the Gowanus Rezoning Area. Without this firm commitment from the City in place, Gowanus Canal Conservancy WILL NOT support actions proposed under the Gowanus Neighborhood Rezoning.

- **Commitment Needed: DEP must provide transparent reporting on implementation of the new stormwater rule.** The DEIS shows a projection, but we need to see the reality as it plays out on the ground. As part of DEP's assessment of water and sewer infrastructure in the DEIS, they have developed a detailed model of the local sewer system that sets the stage for tracking new site sewer connections. DEP's work is above and beyond what is generally required in an EIS and shows that they are listening to community concerns. However, models by their very nature are imperfect projections that must be validated with empirical data and direct measurements as they become available. To ensure the Unified Stormwater Rule performs as anticipated in the DEIS, DEP must provide transparent and accessible reporting of actual impacts as new buildings are constructed to validate the model and prove that new development does not add pollution or worsen neighborhood flooding. The modeling presented in the DEIS should continue to be revisited and updated, particularly with regards to climate change and increased precipitation. The community must have access to this reporting through a community-based Task Force that holds the City and developers accountable for all commitments made through the Gowanus Rezoning.
- **Commitment Needed: DEP must complete a comprehensive hydrology study that anticipates the impacts of climate change and commit to investment in infrastructure that will address existing system capacity issues.** The work that DEP has done on the local sewer model is also a critical step towards the comprehensive Hydrology study that the community has been asking for for years. The city must commit to further developing the model to report on flooding, sewer capacity, and age of existing pipes to highlight areas of concern and identify what infrastructure investment is needed, including upgrades to the Bond-Lorraine sewer line, additional sewer separation projects, and right-of-way and street end green infrastructure.