



THE CITY OF NEW YORK COMMUNITY BOARD SIX

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Amanda Burden
Chairperson
City Planning Commission
22 Reade Street
New York, NY 10007

Dear Chairperson Burden:

I am writing to advise you that at its October 13, 2010 general meeting Brooklyn Community Board 6 resolved unanimously to conditionally support the draft recommendations of the Vision 2020, New York City Comprehensive Waterfront Plan ("Vision 2020"), prepared and released by the Department of City Planning on September 7, 2010. Our conditions are expressed in the form of suggestions in our statement below for the department to consider as modifications or additions to their draft recommendations.

We appreciated the department's efforts to conduct meetings and workshops in every borough throughout the development of this plan. I especially wanted to commend and thank your staff for visiting our Executive Committee and engaging us in this process first at our June 7 committee meeting, then at our September 13 meeting after the draft recommendations were released. By and large, the goals and recommendations identified in Vision 2020 are consistent with the Community Board's positions and actions. Thus, our comments are intended to reinforce particular aspects and elucidate priorities.

Background

Brooklyn Community Board 6 ("CB6") includes the waterfront stretching from Atlantic Avenue through the Columbia Waterfront neighborhood, Red Hook and Gowanus. Because of the importance of the waterfront to the community, we have participated in several major waterfront planning studies, urban renewal plans, rezoning, land use decisions and other actions that are pertinent to the new plan. Of particular relevance are the Red Hook 197-a plan, public engagement concerning various plans for Piers 6-12, and community input regarding rezoning and Gowanus-area redevelopment options.

Our waterfront-related goals previously stated in our Red Hook 197-a plan which was approved by the City in 1996 included:

- *preserve and expand industrial and maritime activity where it is solidly positioned;*
- *promote employment and business opportunities for local residents;*
- *minimize conflict between industrial and residential communities;*
- *improve public transportation access and circulation;*
- *revitalize and create public access to the waterfront.*

In 2002, the Port Authority and EDC issued an RFP to elicit a conceptual redevelopment plan for piers 6 – 12. Brooklyn CB6 participated in good faith, but we were deeply dissatisfied overall with the public participation process. However, our goals were and are consistent. As we previously stated in our comments at the time, our general guidelines that embodied our vision for Piers 6-12 included:

- *Maritime Use: Waterfront for maritime use is a shrinking and precious commodity in this City. No use of this area which is not waterfront-dependent should be considered. The upland areas, because they are necessary for most maritime uses, should also not be squandered for things which can just as well be accomplished inland, but necessary upland commercial activity should be permitted. Thus, the use of Piers 6-12 including its upland areas for residential or “big box” or other ordinary commercial activity must be rejected at this time.*
- *Collateral Advantages: We believe that increased water transport in the Port is necessary to improve air quality, enhance pedestrian safety, reduce truck traffic and roadway deterioration, and support economic development. Even regional security would be enhanced by the diversification to waterborne traffic. And a busy waterway is inherently more pleasing than a busy roadway.*
- *Integrated Recreational Access: Accommodation should be made to allow for public access to the waterfront. Pier 6 is the most likely place in this study area for full pedestrian access, but more limited, special access can be permitted even on the working portions of the piers during off hours or by special arrangement, for example to permit access to firework displays and other cultural events.*
- *Perimeter Greenway: Many members of the community have urged the creation of a perimeter greenway around the Red Hook facility.*
- *Continued Public Ownership: Whatever the specific future uses of the piers, all the associated land should be permanently transferred to some public entity and not be sold or leased for private development.*
- *No Noxious Use: Because the Red Hook facility is so close to established residential neighborhoods, no activity which involved handling garbage, sewage or other noxious material, or the possibility of releasing noxious fumes, should be considered.*
- *Employment Opportunities: It is essential that the retention and creation of jobs at the site be factored into every discussion on the future of the piers. We encourage strategies designed to bolster local hiring. However, we recognize that the total number of site-dependent jobs is only one measure and that broader employment opportunities may derive from other uses consistent with these general guidelines. Marine ports (like airports) make economic contributions not reflected in a job-per-acre count.*

At the time, we also made individual recommendations for piers 6, 7 and 12 while awaiting further information concerning the other piers.

In the ensuing years, we have also been active in discussions concerning these and other specific sites.

Our positions in regard to rezoning and redevelopment along the Gowanus have also been consistent with the goals of economic development and job retention, public access, mixed-use redevelopment where appropriate, historic preservation, and environmental improvement.

We have seen considerable progress on a number of fronts. For example, the decision to integrate Pier 6 into the plan for Brooklyn Bridge Park has yielded a first-class amenity, and some ferry service to Governor's Island is being provided. However, we have also seen setbacks. For example, the relatively new Brooklyn Cruise Terminal facility which represents a significant investment on the City's part that could host other types of events and provide public access to the waterfront is still for the most part unused except for actual cruises.

Vision 2020 Comprehensive Waterfront Plan

Programmatic Recommendations

Goal 1: Expand public access to the waterfront and waterways on public and private property for all New Yorkers and visitors alike and enliven the waterfront with attractive uses, high-quality public spaces, and publicly oriented water-dependent uses, integrated with adjacent upland communities.

Comments

Brooklyn CB6 strongly supports the Vision 2020 recommendations to "Create a More Connected Waterfront." The community has benefited from investment in parks, including Pier 6 at Atlantic Avenue, the Columbia Street Esplanade at Erie Basin, Valentino Park and Pier at Coffey Street; IKEA's Erie Basin Park is also a valuable amenity. However, this leaves large stretches of the waterfront without public access. We would value additional public access spots. We recognize that there are cases where private ownership and industrial uses necessarily preclude open access; in those cases, we encourage the city to creatively and assertively identify ways to increase public uses, benefits and vistas. We also encourage further investment in parks infrastructure and facilities.

Brooklyn CB6 worked with City Planning many years ago to develop the concept of the "Brooklyn Waterfront Trail" running from the Brooklyn Bridge to Red Hook. This evolved into the Brooklyn Greenway Initiative, which is coming to fruition. We encourage cooperation from all local and state agencies in providing right-of-way for the Brooklyn Waterfront Greenway from Greenpoint to Bay Ridge. We believe that greenways are compatible with maritime and industrial areas and need not be separated from such uses. Ultimately, we can envision a

continuous system of waterfront greenways throughout the city being proximate to the waterfront.

Brooklyn CB6 is the community board that is closest to Governor's Island, and we have repeatedly urged consideration of ferry access via Pier 11. There are also opportunities for other recreational and commuter ferries.

We applaud the Vision 2020 plan's recommendation to "Protect historic resources on the waterfront." The waterfront in South Brooklyn was once the epicenter of New York City's shipping industry, and it played an enormous role in the growth of the city as a world port and commercial capital. Although the ports are no longer as active, there are locations that reflect maritime and trade history, and there is still an active maritime industry that is an important sector of the economy and the neighborhood's character.

The Red Hook Graving Dock and Erie Basin shipyards were declared eligible for listing on the National Register of Historic Places and were championed by the Preservation League of New York, the Municipal Art Society and the National Trust for Historic Preservation, but they were demolished for the IKEA. The SuCrest/Revere Sugar Refinery was identified in Red Hook's 197-a Plan (approved by the City Council in 1996) as an opportunity for redevelopment for "maritime or alternative use ... in ways that generate employment for Red Hook residents," but the property was subsequently bought and was demolished by Thor Equities in 2006.

Even the U.S. Army Corps of Engineers prepared a comprehensive report detailing the properties with historic significance along the Gowanus Canal Corridor, all of which were eligible for consideration for the National Register of Historic Places, as part of their Hudson-Raritan Estuary Ecosystem Restoration study of the Gowanus Canal. There are so many historically-significant industrial buildings in Red Hook and Gowanus, but they remain unprotected. We encourage efforts to preserve these resources and to educate the public about the unique history of these areas.

Goal 2: Support economic development activity on the working waterfront.

Comments

As evidenced by the 197-a plan, the Piers 6-12 activity and other input, CB6 is a staunch advocate of maritime-dependent and related economic development on the waterfront. We have been supportive of planning, policy, services and specific land use actions and agreements that advanced this goal, and it remains a top priority. We are aware not only of the importance of these activities to our community, but recognize that we host one of the city's last remaining working waterfronts and that its continuity is of value to the city overall.

Accordingly, we support the recommendations to "Analyze and promote policies to support maritime and industrial businesses." We see tremendous opportunity to expand waterborne freight movement as a means to reduce truck traffic and emissions, facilitate movement of goods, and retain and grow jobs. As we conveyed in testimony regarding the EIS for Piers 7-12:

“We should look to our waterfront as a way to help us out of some of our transportation challenges. We need to rely more on the collateral advantages that waterborne transportation options offer. Increasing the movement of people and goods by water as a way of reducing vehicular trips, particularly truck trips, is and has been a goal of ours.”

Further, we support the plan’s recommendation to encourage green technologies and practices, including cold-ironing to reduce ship emissions and strategies to reduce emissions and increase energy efficiency of port trucks.

And one of the most important projects to our region, which would provide enormous economic development activity for the working waterfront, is the creation of a Cross Harbor Freight Tunnel between New York and New Jersey. The idea for this project isn’t a new one. It’s the reason why the Port Authority of New York and New Jersey was chartered over 80 years ago. As a critical policy objective this project is a goal that must be referenced in Vision 2020, even if the tunnel’s actual construction may not even begin until then.

Goal 3: Restore degraded natural waterfronts, protect wetlands, and shorefront habitats, and improve the environmental quality of our water bodies.

Comments

Clearly, our top priority in the environmental arena is the effective clean-up of the Gowanus Canal and contaminated land. One of the challenges is the coordination among city, state and federal agencies. The Superfund designation is only a part of the picture, as combined sewage overflows will continue to pose a problem and a challenge for our City agencies.

Goal 4: Enhance the public experience of the “Blue Network” by expanding waterborne transportation, on-water recreation, as well as water-oriented educational and cultural activities.

Comments

As described in reference to Goal 1, we strongly desire additional ferry service, including access to Governor’s Island from both Piers 6 and 11. We also encourage facilities for recreational boating (such as a boat house for kayaks and canoes at Valentino Park and Pier) and infrastructure at Pier 6. We like the limited ferry service available to us now, and envision it growing to reach more destinations (possibly to Liberty Island, Ellis Island and to more points in Brooklyn and Manhattan), and serve more functional purposes as a real commuting option, in addition to it being a recreational and tourist draw.

Brooklyn CB6 is also home to some well-established and vital water-oriented education and cultural organizations like PortSide New York, the Hudson River Barge Museum, Urban Divers Estuary Conservancy and the Gowanus Canal Conservancy, in addition to recreational groups like the Gowanus Dredgers and Red Hook Boaters. None of these groups existed 20 years ago. Yet, we see evidence that the waterfront constituency continues to grow like a rising tide, with no sign of ebbing.

Goal 5: Pursue strategies to increase the City's resilience to climate change and sea-level rise.

Comments

We share the city's concerns regarding the vulnerability of the waterfront and adjacent neighborhoods may face due to climate change and severe storms. Significant portions of the Columbia Street waterfront, Red Hook and Gowanus were originally underwater; the shoreline along the Buttermilk Channel went in as far as Columbia and Hicks Streets, parts of Red Hook were tidal lands and marshes, and the Gowanus Creek had inlets and ponds that were filled in when the canal was constructed. Because all of these locations are low and are built on infill, these locations may be particularly vulnerable.

We have met with representatives of FEMA and the Buildings Department over the years to discuss our concerns about climate change and sea-level rise on district's like ours. We have also participated in discussions with the Department of Environmental Protection over the development of best management practices for storm water retention, diversion and release. Sadly, these discussions result in slow movement and even slower adoption by other agencies which may not see climate change as its primary mandate. Every day we watch the same impervious street and sidewalk surfaces being constructed, buildings constructed without green roofs or other storm water retention capacity, and the open storage of chemicals and other materials that might be disturbed by a storm surge creating new and preventable forms of inland contamination.

Goal 6: Increase the efficiency of waterfront construction and operations.

Each year through the establishment of its budget priorities Brooklyn CB6 identifies as an Expense budget request the importance of expanding the Department of Small Business Services' Waterfront Enforcement Division staff beyond the current 6 people. This hard-working division is responsible for review and issuing building permits, monitoring construction and going after illegal dumping occurring across all 580 miles of New York City's waterfront.

When the City's Department of Ports & Trade was dissolved in 1991, somehow the responsibilities that we would have associated with either the Buildings Department or Sanitation Enforcement ended up at the Department of Small Business Services. This vital division is disconnected from other planning entities, like City Planning and the Economic Development Corporation, and lacks the resources of other larger administrative agencies as well.

We appreciate the hard work and responsiveness of the Waterfront Enforcement Division, and feel that their mission can be better served if it were more fully integrated into the planning, administrative and development roles played by other agencies who also take an active interest in the waterfront.

Reach Recommendations

Brooklyn Community Board 6's waterfront areas are within Reach 14S ("Brooklyn Upper Bay South"), which also includes Sunset Park. The Vision 2020 draft recommendations identified five "Areas of Opportunity" within the CB6 section of Reach 14S.

1) Piers 7-12

- Support continuation of industrial uses
- Support appropriate alignment of Brooklyn Greenway plan through this area
- Explore preservation of historic properties and creation of waterfront interpretive center focused on history of working waterfront
- Support use of green port technology, such as cold ironing
- Minimize traffic conflicts between trucks and pedestrians/bicyclists
- Pursue development as a "hub" for maritime support services in Atlantic Basin
- Support opportunities for active public use of cruise terminal on days when ship is not in port
- Study opportunities for active water-related public uses, such as recreation and educational programming

Comments

We are generally supportive of these recommendations, which are fully consistent with previous positions taken by the board. As we previously stated in our 197-a plan, we believe that Wolcott Street street-end provides an opportunity for waterfront public access. We would like to see City Planning acknowledge the community's desire for a permanent boat house facility at the Valentino Park & Pier south of Pier 12. We would also like to see the desire for ferry service at Pier 11 reflected, to support the waterfront interpretive center concept already in the draft recommendations. We would like to see PortSide New York and their ship, the Mary A. Whalen, acknowledged for their role in creating the notion of an interpretive center focused on the history and continuing potential of the working waterfront.

We would like to see a more specific enumeration of potential historic properties to move the discussion toward a narrower case-by-case review as we are aware that the overall preservation of historic properties could at times conflict with other economic and development opportunities. The plan should be more explicit in this area.

Lastly, we see much more opportunities for a cleaner and greener port that extend beyond cold-ironing, although that would be a great start. Cleaner surface transportation, greater reliance on alternative energy sources for support equipment, and increased barging and water-borne movement of goods are all goals we would like to see reflected in the plan.

2) 280 Richards Street

- Support appropriate development with uses compatible with adjacent water-dependent industry and explore opportunities for incorporating public access.

Comments

We have not been presented with a specific proposal. The property will require land use action. Such consideration must be based on the goals and priorities that we have articulated, including waterfront-dependent economic development and public access.

3) Gowanus Canal

- Support infrastructure improvements to improve water quality and remediation of contaminated soil and sediments through such initiatives as planned upgrade of the pumping station and flushing tunnel, Superfund cleanup program, and other efforts Support rezoning for a mix of uses where appropriate in underutilized areas with provisions for continuous waterfront public access, and with cleanup of contaminated sites consistent with applicable City, State, and Federal standards
- Explore opportunities for safe indirect-contact in-water recreation, in consultation with State and Federal regulators
- Support preservation of historic properties
- Support continued industrial activities
- Support plans to use street end parks and pervious surfaces to capture storm water and provide education to public about storm water management

Comments

We are supportive of these recommendations. Additionally, City Planning should include specific mention of its support for the Hamilton Avenue Marine Transfer Station, a goal of Brooklyn CB7's, as it did for the Southwest Brooklyn Marine Terminal Station in Reach 15, at Gravesend Bay. The Hamilton Avenue MTS is an important regional facility that will ensure increased reliance on water-borne movement of bulk materials and decreased reliance on truck trips through our district.

We would like to see a more specific enumeration of potential historic properties to move the discussion toward a narrower case-by-case review as we are aware that the overall preservation of historic properties could at times conflict with other economic and development opportunities. The plan should be more explicit in this area.

City Planning should also support the development and implementation of a flooding remediation plan for the Gowanus Canal area. Our communities, particularly in the 2nd Avenue corridor, and in the 3rd-4th Avenue corridor between Bergen and Carroll Streets, have been suffering the effects of flooding increasingly these past few years with no relief in sight. This must be reflected as a necessary short-term goal which also presents an opportunity to incorporate best management practices for storm water diversion and retention.

Lastly, City Planning should state what its long-term intentions are for their Gowanus Rezoning initiative which has been held in abeyance since the announcement of the inclusion of the Gowanus Canal on the National Priorities List as a Superfund site.

4) 3rd Avenue/3rd Street site

- Continue ongoing remediation efforts
- Explore options for reuse along with providing public and visual access to waterfront

Comments

We are supportive of these recommendations. Given that the property is privately-owned and is being remediated under the state's brownfields program, it is unclear what ability the city has to influence remediation efforts or site design. We encourage efforts to promote public and visual access.

Additionally, in light of the delays in developing the site, we ask that the city explore strategies to accelerate the restoration of the privately-owned landmarked building on the corner of this lot. The historic "Coignet Stone Company" building was intended to be preserved. We encourage the city to explore ways to encourage an expeditious restoration of this privately-held property, regardless of the timing of the adjacent development.

5) Public Place site

- Support site remediation in cooperation with responsible parties and State and Federal regulators, and pursue planned housing development with public waterfront open space.

Comments

We are generally supportive of this recommendation. However, the Superfund designation and the economic downturn may provide an opportunity to step back and reconsider development scenarios. For example, we recommend that the adjacent property to the south (the Abadi Waterhouse) be added to the Public Place site and a separate planning process be undertaken to determine its best use. The name of this Area of Opportunity should become the "Public Place & Abadi Warehouse sites." In contrast to Public Place, the Abadi Warehouse property is privately-owned, but it shared prior uses and suffers from the same contamination problems. We are not making a specific recommendation concerning redevelopment scenarios, as we do not yet know what may be appropriate on this site.

We recommend that Erie Basin be added as a sixth Area of Opportunity for Reach 14S. The continuing presence of the New York Police Department's Evidence Vehicle Facility is a lost opportunity, in that it is not maritime-dependent nor of contributing value to the local community. We welcome a careful and thoughtful exploration of long-term alternatives for the property that includes community participation.

We look forward to continuing to work with the city on bringing Vision 2020 to fruition.

Thank you for the opportunity to comment.

Sincerely,

Richard S. Bashner
Chairperson