Dear Councilmember Menchaca,

As a long-standing community-based organization in Sunset Park since 1966, UPROSE would like to provide you with: 1. Specific comments on the concessions proposed by your office that were expressed in your presentation on Monday, September 16th at Sunset Park High School, 2. Justification of how Industry City’s proposal is inconsistent with community, city, and state reports and plans, 3. Information on the community-informed Green Resilient Industrial District proposal (GRID) as a rezoning alternative, and 4. Analyses of how GRID contextualizes Industry’s City proposal and re-instates self-determination to the Sunset Park community.

Section I. Response to Concessions
1. **No Hotels**
   a. We agree that developing hotels on the industrial waterfront would result in no community benefits and only exacerbate rapid gentrification and displacement issues in Sunset Park. However, even if you are able to restrict Industry City from developing hotels, what will they do with the M2-4 rezoned area that would allow them to significantly increase their Floor Area Ratio (FAR)? Are there any protections in place that would bar the development of hotels and similar uses that have the same impacts for the indefinite future?

   b. According to your November 10, 2017 testimony to the City Planning Commission, you were already steadfast on not allowing development of hotels in Sunset Park’s industrial waterfront. This concession does not seem appropriately branded as a “community benefit”, when the option was never open for negotiation.

2. **Restrict Retail**
   a. Sunset Park is one of the city’s largest Significant Maritime and Industrial Areas (SMIAs) and Industrial Business Zones (IBZs). The industrial character of the neighborhood poses unique health and climate challenges, but also offers a plethora of diverse opportunities for the community. Rezoning any M3 industrial spaces to allow any type of retail would cause detrimental impacts to local residents. Industrial jobs offer well-paid working-class jobs with opportunities for career mobility to thousands of local Sunset Park residents that would otherwise not have such opportunities.

   b. Even at $15 an hour minimum wage, the average industrial job pays twice as much and includes employee benefits that retail jobs do not traditionally offer. We want more clarification on this concession. IC often sites the increase in the number of businesses and jobs, but there is little information on the quality of jobs IC is offering to existing Sunset Park residents. Are these jobs relocated jobs from other parts of the city, or new jobs available to Sunset Park residents?

   c. **Questions:**
      
      i. How many square feet of retail was in Industry City’s original proposal, and how much are you reducing it to?
      
      ii. What are the metrics for deciding how much retail should be at IC?
      
      iii. What strategies are in place to ensure that Industry City will not exceed the restricted amount of retail permitted?
      
      iv. Does the limit on retail apply to all of IC or only to the new construction?
v. Is there a minimum and maximum size for retail? What are the proposed locations for retail? What kind of retail? Destination, local?

vi. **Why are offices as a primary use not being limited given the experiences of places like San Francisco?**

vii. Why so much parking?

3. **Create a “Manufacturing Hub” at IC**
   a. The concept of a “manufacturing hub” at Industry City is contradictory to the negative impacts IC has already had in the community. Industry City’s existing campus transformed 5.5 million square feet of M3 industrial manufacturing space to luxury retail and commercial spaces. The Innovation Lab at IC has proven to create an insufficient number of industrial jobs for Sunset Park residents. According to your presentation, in a year and a half, only 114 jobs came out of the Innovation Lab and a mere 40 jobs went to Sunset Park residents.

   b. **Questions:**
      
      i. What is a hub?
      ii. What is the mission of the hub?
      iii. How many square feet?
      iv. Where will it be located?
      v. How will they choose the non-profit?
      vi. How will it be governed?
      vii. How will the community know what jobs will be created?
      viii. Will there be a goal regarding the density of jobs in the hub?
      ix. How many businesses?
      x. Will they be new businesses, existing, or relocating businesses?
      xi. How many jobs will be created?
      xii. What will rents and lease terms be?

4. **Technical High School and Adult Training Center**
   a. We do not agree with creating a technical high school at IC. Majority of Sunset Park’s industrial waterfront is in storm surge zones, floodplains, and are brownfields. We must not place young people’s health in harm’s way by placing a school in Industry City. There needs to be more thoughtful and holistic considerations given to the siting and planning of youth educational institutions.

   b. **Questions:**
      
      i. What kind of training, skills, and jobs?
ii. What types of apprenticeships?
iii. Who will place them and where will they be placed?
iv. How will the workforce be recruited?
v. Who and how will the outreach be conducted?
vi. Will it be limited to Sunset Park residents?
vii. What is the adult training center?
viii. Will it be for existing businesses and employees? For existing residents?

c. **Questions (training):**
i. What does worker cooperative support look like?
ii. What specific program will be used for worker cooperative training and small businesses?
iii. Will you facilitate access to capital to support new cooperatives?
iv. Who will pay for this, and how much?
v. Will you consider grants, or default to low-interest loans that remain very expensive for businesses that operate with tight financial margins.
vi. Expand and enhance Innovation Lab to do what?

5. **Tenant Organizing and Affordable Housing**

a. There are many existing grassroots tenants organizing efforts. Have you engaged with any of these groups to learn about their work, challenges, and needs? Rising rents, displacement, and tenant harassment are all negative impacts caused by IC’s development. As a community we need to ensure that the causes of these issues are controlled and managed instead of solely focusing on the effects.

b. **Questions:**

   i. Funded by whom? For whom?
   ii. Where will funds go?
   iii. Will it complement City funding or entirely private funding?
   iv. What is the goal of organizing?

**Section II. Industry City’s Proposal**

Industry City’s rezoning proposal is extremely problematic for the Sunset Park community for many reasons, from exacerbating rapid displacement and loss of well-paid working-class industrial jobs to ignoring the ever-intensifying impacts of climate change. Another major implication of the rezoning proposal is its inconsistency with existing community, city, and state plans that emphasize the immediate necessity to transition into a more climate resilient and sustainable future.
The GRID and UPROSE’s position on the Industry City rezoning is not fighting Industry City’s existence, but the way in which Industry City exists in the Sunset Park community. It must be a priority to update local plans and integrate principles and recommendations from the GRID report to contextualize the Industry City proposal and create clear guidelines for what type of rezoning would deliver long-term and diverse community benefits.

Today is an opportunity, for you and the Sunset Park community, to stop playing by the developer’s rules and create our own. As a community we must stand in solidarity and create the necessary guardrails as the foundation for how development will take place in Sunset Park. Saying “no” to Industry City’s proposal is an option because the GRID plan is the community’s rezoning proposal.

Sunset Park 197-A Plan

197-A plan was approved 10 years ago and does not include lessons learned from Superstorm Sandy and predates the City’s focus on Adaptation & Mitigation strategies. The current plan is outdated and needs to incorporate the realized and anticipated risks of climate change. We recommend you create a CB7 interdisciplinary subcommittee to review the plan for consistency with new policies and make recommendations for its update.

Waterfront Revitalization Plan

Before any rezoning proposal is approved, we request all necessary plans that help determine appropriate developments be reviewed and adequately updated to reflect existing community issues and climate risks. These plans are the framework that guide and dictate the types and processes of development in Sunset Park that honors community and industry.

• Policy 2.5: "Incorporate consideration of climate change and sea level rise into the planning and design of waterfront industrial development and infrastructure, pursuant to WRP Policy 6.2"

• Policy 6.2: "Integrate consideration of the latest New York City projections of climate change and sea level rise (as published in New York City Panel on Climate Change 2015 Report, Chapter 2: Sea Level Rise and Coastal Storms) into the planning and design of projects in the city’s Coastal Zone."

• Waterfront Plan itself IS a 197a plan. It is updated every 10 years. Other 197a plans should also be able to be updated.
Brownfield Opportunity Area

- The recommendations of the Sunset Park BOA are completely consistent with the GRID. They both focus on creating green industry, developing sustainable green infrastructure, and building workforce training opportunities for local residents.

- Industry City only looks at its own properties and the proposed rezoning area. The BOA looks at a much larger area and calls for a holistic view of the waterfront and greater Sunset Park community.

- Industry City only really discusses the development of waterfront access to the Park and through 43rd St. and the development of a retail access area. Industry City’s proposal is narrow in scope and fails to consider vital aspects of systems that have significant influence on one another.

- Industry City and you do discuss some green practices for the IC property including a solar roof but the GRID does as well for not only for IC but for the surrounding area.
Section III. Green Resilient Industrial District (GRID)

The GRID is a programmatic overlay that is the community-proposed alternative to Industry City’s proposal to rezone 1.5 million square feet of Sunset Park’s M-3 zoned industrial waterfront into luxury big box retail. The GRID proposal is a holistic and comprehensive vision that strategically plans for existing and anticipated climate impacts in Sunset Park, Brooklyn. The plan is rooted in transforming the neighborhood and industrial waterfront to integrate climate adaptation, mitigation, and resilience. The GRID also addresses the need to transition the economy from a linear one dependent on fossil fuels to a green industrial economy that trains local residents for renewable energy and climate jobs. The most important aspect of the GRID is that it reflects comprehensive and diverse community needs that prepares Sunset Park for the long-term impacts of climate change.

GRID Goals:
1. Preserve the industrial character of Sunset Park’s waterfront
2. Retain and create (green) well-paid working-class jobs
3. Support green industrial innovation
4. Promote climate resiliency and Just Transition through circular industrial economy practices.
A. Green Waterfront & Industrial Core

B. Green transportation & sustainable light industrial area

C. Green manufacturing & design area (IC’s rezoning area)

D. Residential sustainability pilot

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<thead>
<tr>
<th>Issue</th>
<th>Council Member Menchaca</th>
<th>GRID</th>
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<tbody>
<tr>
<td>Retail</td>
<td>Limit retail to unknown number less than 500,000; No big box stores</td>
<td>Restricted to accessory uses</td>
</tr>
<tr>
<td>Offices</td>
<td>N/A</td>
<td>Restricted to accessory uses</td>
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<tr>
<td>Hotels</td>
<td>No Hotels</td>
<td>No Hotels</td>
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<tr>
<td>Manufacturing retention</td>
<td>Manufacturing Hub - unknown size and uses/types</td>
<td>50% industrial uses, promote and incentivize green industry, including advanced manufacturing, tech and design</td>
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<td>Workforce Development</td>
<td>Technical High School</td>
<td>M励EX - Training and Technical Assistance for business and workforce development for green industries. Additional technical assistance and training for energy efficiency, renewable energy and waste reduction throughout all schools and community organizations in Sunset Park.</td>
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<td>Industrial Displacement</td>
<td>Local purchasing for IC businesses</td>
<td>Retain existing zoning and limiting permitted uses, mitigate real estate displacement pressures from non-industrial uses. Provide incentives to owners who provide lower rent and longer leases to industrial tenants and green industrial uses. Opportunity Zone Funds in industrial zones to be focused on new green resilient industrial development and preservation and greening of existing industries. All efforts shall be made to stop displacement of businesses and residents from Opportunity Zone Fract.</td>
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<td>Residential Displacement</td>
<td>Commitments for tenant organizing funding, anti-harrassment policy - free lawyers etc.</td>
<td>Opportunity Zone funds in residential areas to be restricted to LEED certified 100% affordable housing targeted to local AMI. Calls for Council and Mayoral protections</td>
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<td>Jobs</td>
<td>Relies on IC projections of jobs with the added benefit of manufacturing hub and Innovation Lab job placement</td>
<td>Provides strategies for taking advantage of CLCPA and GMA green industrial jobs including energy efficiency and renewable energy jobs. Connects local businesses to waterfront and other maritime development to create local community wealth</td>
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<td>Decision-making</td>
<td>Traditional top-down NYC planning processes with a negotiated “community benefits” package.</td>
<td>Create a diverse multi-stakeholder organization or some type of direct community representation / oversight of the redevelopment process.</td>
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Figure 3: Chart comparison of issues addressed in the GRID

Section IV. GRID in Context

Sunset Park has the opportunity to become New York City’s first Green Resilient Industrial District (GRID) and be a national model for local grassroots planning and implementation of a Just Transition economy as called for by climate justice advocates.

The recently passed New York City Climate Mobilization Act is estimated to generate 27,000 construction and clean tech jobs per year and 16,995 indirect jobs. These are maintenance and operations, construction, and supply manufacturing jobs. The State projects 150,000 jobs per year over a decade from New York State’s Climate Leadership and Community Protection Act (CLCPA) in the construction and clean energy fields.
Developments like Industry City primarily focus on office, retail, entertainment, and high tech uses price out green industrial development and jeopardize the opportunity for New York City to take advantage of the green jobs generated from these initiatives. The Industry City Innovation District and rezoning proposal will only perpetuate gentrification, loss of social cohesion, disparity, and climate risk. Industry City’s development does not fit into the Just Transition model as its existing campus and proposed expansion is rooted in the extractive economy that only prioritizes short-term profits and compromises all consideration for community, climate, or health.

The GRID alternative is not a simple rejection of the Industry City economic development model. While green tech and design businesses and academic research uses are important components of a GRID, much of Industry City’s current marketing, and its proposed rezoning to promote retail, office, entertainment and hotels, are not. Rather, GRID emphasizes the critical role that existing Sunset Park residents and maritime, industrial and manufacturing business must play for New York City to become a leader in a Just Transition to a green economy with widespread, equitable benefits.

In contrast to the Industry City proposal, the GRID would foster sustainable industrial development and create a truly “innovative” district that would:

1. **Leverage** existing green and industrial resources and public investments in Sunset Park,

2. **Harness** additional targeted technical and financial assistance to improve air quality and local environmental conditions,

3. **Create** new green jobs such as those in energy retrofits and green industries,

4. **Provide** workforce development to make sure that these benefits accrue to New York City workers, and

5. **Support** and operationalize the goals of the Mayor’s 80X50 plan, New York City Climate Mobilization Act (CMA), Freight NYC, the New York State’s Climate Leadership and Community Protection Act (CLCPA) and the proposed Green New Deal.

**Key Priorities**

1. **Create** a diverse multi-stakeholder organization that will help build transparency and accountability in the planning process and honors community needs.
2. **Update** the Sunset Park 197-A Plan and Waterfront Revitalization Plan to integrate climate risks.
3. **Restrict** all retail and office space to accessory uses only.
4. **Develop** clear requirements of at least 50% industrial uses
5. **Invest** in training, technical assistance, and education for businesses and workforce development in green industries.
6. **Ensure** any rezoning is consistent with all local, city, and state development plans such as the Sunset Park BOA, WRP, CMA, CLCPA, etc.

7. **Adopt** the planning recommendations and guidelines for sustainable development from the GRID.

8. **Utilize** the Sunset Park industrial waterfront to build for climate adaptation, mitigation, and resilience.

*We are currently analyzing Industry City’s Draft Environmental Impact Statement (DEIS), submitted Friday, October 25, 2019. We will publish new reports soon.*