

**New York Metro Chapter
American Planning Association
Greenpoint-Williamsburg Rezoning**

January 2005



Thank you for giving us the opportunity to comment on this significant planning initiative in New York City. The NY Metro Chapter of the APA represents approximately 1000 members in the New York metropolitan region which includes the five boroughs of New York City, Nassau and Suffolk counties on Long Island, Westchester County and the Hudson Valley. Our members are planners involved in land use, open space preservation and development, transportation, community and economic development, and urban design.

We commend the Department of City Planning for a truly fine planning effort. The Department has clearly done a tremendous amount of research and outreach to assess the future planning needs of Greenpoint and Williamsburg. The Brooklyn office is to be especially lauded for putting together such a wide-ranging plan that responds to needs of changing communities within a changing city. We commend in particular continuing the City's encouragement of waterfront revitalization, by seeking to promote new development and activity while ensuring public access to a 30-block shoreline that has long been neglected and inaccessible.

While generally impressed with this planning initiative, the APA wishes to note there are some areas that might be improved.

Use

The Department has appropriately recognized that many manufacturing districts should be rezoned, as the City no longer needs the same amount of space for manufacturing as it did 40 years ago. In those areas, especially along the waterfront, there is an opportunity to plan for other uses. We therefore support much of the rezoning to other uses. However, there is still a wide variety of viable manufacturing and some burgeoning light manufacturing in the rezoning area. It has been widely recognized by the community and by City Planning that the manufacturing sector is a valuable asset to Greenpoint and Williamsburg. The Metro Chapter is concerned that residential use in the proposed mixed-use districts will, in short, order result in manufacturing uses being diminished and displaced by the other uses. We therefore encouraged City Planning, instead, to take a closer look at existing manufacturing and the locations of the burgeoning manufacturing with an eye toward determining whether there are more areas where light manufacturing designations should be retained. Finally, the Commission should urge its sister agencies to explore additional non-zoning incentives and actions to retain the viable manufacturing areas.

New York Metro Chapter
 %o NPC, 232 East 11TH Street
 New York, NY 10003
Phone: 212.228.7875
Fax: 212.471.9987
Email: office@nyplanning.org
Web: www.nyplanning.org

City Planning's use of commercial overlays along certain streets connecting to the waterfront will encourage street activity in these areas and add to the vibrancy of the community. The APA would like to stress the importance of commercial activity along primary corridors to the waterfront. In the event that any of the proposed MX Districts are changed, City Planning must use appropriate tools to ensure continuity of commercial use along Grand Street, Metropolitan Avenue, North 6th Street, Greenpoint Avenue, and Green Street.

Bulk

The APA notes that the proposal would preserve low-rise character of most of the area, and the upland portion of waterfront sites meet the neighborhood at a compatible level. While there are good reasons for lowering the heights permitted near the waterfront, we recognize the need for new development in this area to include waterfront access development, inclusionary housing, infrastructure and other costly construction. The area near the waterfront can accommodate the proposed height better than the inland areas. A larger scale is allowed along the waterfront, where new developments will visibly join the Manhattan skyline. We do not have enough information to comment on the economics of the development, and would like to see less height if feasible.

One element of the bulk guidelines that should be changed is the allowance of up to 170-feet along any horizontal dimension of waterfront buildings. Parallel to the waterfront, this width would have the effect of walling off the upland community from the waterfront. The maximum building width parallel to the waterfront should be reduced to 100 feet, which is the dimension currently allowed by the City's waterfront zoning regulations. The proposed 170-foot dimension should be applicable only to a walls perpendicular to the waterfront. Tall, thin towers along the waterfront are preferable to low, wide slabs that would wall off the upland community.

We would like to see exploration of Community Board 11's recommendation to encourage the adaptive reuse of existing manufacturing buildings. This is good conservation and preserves the existing fabric of the built environment.

Waterfront Access Plan

The Metro Chapter commends the use of the Waterfront Access Plan in the Greenpoint-Williamsburg rezoning. It will provide a much-needed resource for the residents of these communities and the Borough. Recreational opportunities will have a tremendously positive impact on the area.

The APA has some concerns, however, about the piecemeal development of the proposed esplanade, and about its ongoing maintenance.

In formulating the Waterfront Access Plan, City Planning faced the difficulty that the waterfront is all private property. . Relying on private developers to complete the esplanade will likely result in discontinuity, as waterfront parcels will be

developed at different rates. Learning from previous planning efforts where portions of "public" places have been inaccessible, the APA encourages much greater public involvement to ensure expeditious development and continuous access for this large and important stretch of waterfront.

With regard to maintenance of the esplanade, the APA strongly suggests the creation of a Parks Improvement District or Waterfront Improvement District that would be administered with the goal of implementing a waterfront access plan, and eventually operating the waterfront park. Seed funding could come from private development. Another option to explore is a public-private partnership, with models such the Riverside Park South Corporation or Hudson River Park Trust.

Regardless of how waterfront access is ultimately developed, it may be helpful for the Waterfront Access Plan to wrap open space around each development site to ensure that residents can access completed esplanade segments regardless of adjacent lot development.

Parks Distribution

While the rezoning does offer extensive access to a waterfront that has long been blocked off, the overall distribution of parkland favors Williamsburg, despite the fact that a greater share of new residential development may be in Greenpoint. In Williamsburg, the plan allocates a state park south of the Bushwick inlet, in addition to its current McCarron Park. The rezoning should allocate more open space for active recreational use in Greenpoint, which already has a shortage of such space. The APA recommends designation of parcels 3 and 4 (as noted in the WAP map) along Newtown Creek as parkland for active recreation. Parcel 3 is currently held by the MTA and parcel 4 would need to be acquired from a private landowner. Active recreational space in this area would provide a much-needed resource to the residents of Greenpoint.

Inclusionary Housing

The ADA Metro Chapter notes the unprecedented experiment in the City for expanding inclusionary zoning beyond R10 districts and, in general, supports the inclusionary housing aspects of the Greenpoint-Williamsburg land use proposal presented by DCP and Department of Housing, Preservation, and Development (HPD), including the December 2004 update. DCP/HPD estimates that implementation of the plan will produce 1,650 to 2,500 affordable housing units, or 16% to 24% of the total 10,300 housing units planned. While no plan perfectly pleases everyone, our consensus is that this plan includes enough goals and incentives toward the production of affordable housing to be a positive step forward. The Chapter believes the inclusionary housing program should be voluntary. The economic "carrots," through Floor Area Ratio (FAR) bonuses and permitting the developer to mix the zoning incentives with existing housing programs, will be sufficient to motivate the private sector to produce the housing.

The Chapter supports CB1's proposal that preference be given to community residents for 30-50% of the affordable housing units produced, and further supports the anti-harassment proposal of the CB1 plan. Anti-harassment rulings have judicial precedent stemming from Manhattan's Clinton neighborhood, and, to our understanding, have been incorporated into the Hudson Yards redevelopment plan.

We welcome the collaboration between DCP and HPD in creating an inclusionary housing plan that can be implemented, including the provision of financing through programs of the Housing Development Corporation, HPD, and the Housing Finance Agency.

Other

Planning for this area should not stop with the zoning actions, and to make this area successful, the City should look to increase transit access, and services such as schools, libraries, fire and police.

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The NYMetro chapter of APA applauds City Planning's efforts to lay the groundwork for the future of Greenpoint and Williamsburg. The Department reached out to the community and determined that waterfront access and manufacturing jobs were two important areas of focus. By revisiting the proposals for mixed use zoning and waterfront development, City Planning may be able to further hone an already stellar plan.

Very truly yours,

APA METRO CHAPTER