



March 6, 2019

Mr. Andrew Kimball  
Chief Executive Officer  
Industry City  
220 36<sup>th</sup> Street, Suite #2-A  
Brooklyn, NY 11232

Dear Mr. Kimball,

It is our understanding that Industry City submitted a rezoning application to the City Planning Commission to begin a Uniform Land Use Review Procedure (ULURP). Industry City proposes to change part of the Southwest Brooklyn Industrial Business Zone to allow for hotel, large scale retail, and academic facilities on its six million square-foot property. As representatives of the Sunset Park community, and as key ULURP stakeholders, we are not ready to begin the ULURP process. Community Board 7 is in the middle of a process to more comprehensively evaluate the waterfront and address concerns about displacement and gentrification, which has still divided members of the Land Use Committee. If this process does not finish, neither the Community Board nor the Council Member will be in a position to approve any rezoning. Given your commitment thus far to follow the community's lead, we ask that you delay the application and join us in seeing this process through.

As the Amazon HQ deal highlighted - and as urban planners, environmentalists, and Sunset Park leaders have understood for a long time - ULURP is insufficient for evaluating displacement, gentrification, and the effects of climate change. This is because ULURP operates like a negotiation, not a fact-finding mission. For the negotiation to succeed, the community must come ready with its vision and desired outcomes in place. The two months allotted to the Community Board by ULURP is not enough time to work out those positions. Nor will they be well-informed positions if the pressures on those discussions are transactional rather than transparent.

It is for these reasons that the Community Board initiated a community engagement process last year to consider Industry City's proposal. At the same time, the Council Member is engaging local stakeholders and developing his own evaluation of Industry City's proposal. These processes must finish before ULURP will be considered:

- A presentation to the Sunset Park community of the findings from last year's town halls;
- An explanation by Industry City of how its rezoning proposal will mitigate displacement, gentrification, rising rents, congestion, and the effects of climate change;
- A community-based needs assessment, or similar review, to update the community's vision for the waterfront;
- A presentation by the Council Member to the Community Board of his findings based on his own engagement process; and
- A review by the Sunset Park community of the Community Board and Council Member's assessments.

This community-led process is necessary because ULURP has historically failed to address the most urgent concerns voiced by the Sunset Park community. While ULURP was established in 1975 to prevent large-scale development projects from undermining social welfare, we know after 44 years that it is not meeting that goal. Developers have used the promise of good-paying jobs, schools, community centers, recreation centers, union contracts, and a host of other incentives during ULURP to extract community support. The result is almost always the same: gentrification, rising rents, pollution, congestion, and the one thing it was meant to mitigate, displacement.

What matters therefore in evaluating Industry City's rezoning proposal is not only the number of jobs it may create, or businesses it will tenant, or local residents it will employ, but whether the proposal will exacerbate these economic, social, and environmental trends. The legacy of our neighborhood is fundamentally a working manufacturing one. We are not opposed to new job creation; to the contrary, we eagerly welcome good jobs for our residents, and want to maintain our neighborhood's legacy, but it must be done in a way that is fundamentally backed by the community and that seriously takes into account these larger trends.

Industry City is a private actor that is asking the Sunset Park community to partially rezone the Southwest Brooklyn Industrial Business Zone (IBZ.) Not only is this unprecedented in how it may undermine the very purpose of the IBZ, it could dramatically increase the displacement that Sunset Park and similar waterfront communities are experiencing. Meanwhile, despite being one of Brooklyn's last industrial strongholds, Sunset Park rents are rising dramatically, low-income families and individuals are being displaced, and small businesses are closing or relocating - all while climate change raises utility bills, alters our waterfronts, and disproportionately affects the air, land, and water near our low-income, minority, and immigrant communities.

To initiate a ULURP before addressing these concerns satisfactorily would demonstrate a lack of serious consideration for these critical issues facing Sunset Park and their impact on the community. It would also demonstrate a disregard of the Sunset Park community's priorities in how it wants to evaluate proposals with enormous citywide ramifications.

There is a better way forward. It requires taking the community's lead and allowing the process initiated last year to finish. In a post-Amazon world, we have an opportunity to show New York City how to evaluate large-scale development proposals to address twenty-first century challenges. We look forward to your response.

Sincerely,

Handwritten signature of Carlos Menchaca in black ink.

Carlos Menchaca  
New York City Council Member | District 38

Handwritten signature of Cesar Zuniga in blue ink.

Cesar Zuniga  
Chair | Brooklyn Community Board 7

Cc: Mayor Bill de Blasio  
Marisa Lago, Director of City Planning and Chair of City Planning Commission