



A STUDY OF WHOLE FOODS MARKET'S USE VARIANCE APPLICATION TO BUILD A REGIONAL STORE IN GOWANUS BROOKLYN

Submitted to

**New York City
Board of Standards & Appeals**

as

**Written Testimony in Objection to
Variance Application #66-11-BZ**

Prepared and Submitted by

**The Gowanus Institute
232 Third Street #C101
Brooklyn, NY 11215**

Submitted on

13 December 2011 (Rev 1.0)



The **Gowanus Institute** is an independent think tank dedicated to realizing the most productive physical, cultural and economic development in the Gowanus neighborhood in Brooklyn that will enrich its working and living communities as well as the city with a balanced set of environmental & social profits, economic value and fiscal benefit.

The **Gowanus Institute** is supported by intellectual contributions from individuals in industry, government and academia with expertise in zoning policy, land use law, workforce & economic development, property development & finance, manufacturing & maritime industries, environmental sciences & policy, and related disciplines.

The **Gowanus Institute** will:

- ◆ Conduct comprehensive **studies** and produce detailed **reports** on existing and proposed property developments and rezoning plans;
- ◆ Develop and propose alternate development and re-zoning **plans**, when necessary;
- ◆ Work with the local community and organizations to develop a cohesive **voice** to communicate its needs and desires for developing the neighborhood;
- ◆ Work with individual researchers, academic institutions, commercial and non-profit developers as well as city, state and federal agencies to **contribute** and **enhance** their studies, proposals and plans for the neighborhood;
- ◆ Develop, **present** and host public **programs** and events related to Gowanus neighborhood;
- ◆ Develop and **maintain** a physical **library** and on-line **repository** of existing information, studies, reports and other documents related to the Gowanus neighborhood.

This report was prepared and submitted as testimony in objection to Whole Food Market's application for a use variance to New York City Board of Standards & Appeals (Cal. No. BZ-11-66).

This report does not purport to present thorough legal opinion. This report does not necessarily reflect the individual views of all the thinkers of the Gowanus Institute, however, their contributions have informed and shaped the report. It is assumed that the reader is familiar with the general and specific details of the study topic.

Report edited by: **Nathan Elbogen, Jessica Fain, Ariel Krasnow**

Report reviewed by: **Ben Margolis, Edward Morris, John Shapiro, Alisa Valderrama**

THE GOWANUS INSTITUTE

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0.0	EXECUTIVE SUMMARY.....	2
0.1	SITE MAPS AND DRAWINGS.....	5
1.0	INTRODUCTION.....	12
1.1	<i>BACKGROUND</i>	13
1.2	<i>GOWANUS PLANNING</i>	14
1.3	<i>WRONG FOR THE PEOPLE AND WRONG FOR THE PLANET</i>	15
2.0	WFM'S VARIANCE APPLICATION.....	17
2.1	<i>STATEMENT OF FACTS</i>	17
2.2	<i>STATEMENT OF FINDINGS</i>	17
2.3	<i>CEQR AND OTHER SUPPORTING MATERIAL</i>	22
2.4	<i>PAST DECISIONS BY BSA</i>	24
2.5	<i>PROCEDURAL ISSUES</i>	25
3.0	NEW YORK CITY'S ECONOMIC & JOB DEVELOPMENT VISION.....	26
3.1	<i>THE NEED FOR QUALITY JOBS</i>	26
3.2	<i>THE CITY'S INDUSTRIAL POLICY</i>	26
3.3	<i>GOWANUS WORKS</i>	27
3.4	<i>ADVANTAGES OF MANUFACTURING VS RETAIL</i>	29
4.0	ENVIRONMENTAL ISSUES.....	30
4.1	<i>WETLANDS & FLOODING</i>	30
4.2	<i>GOWANUS CANAL EPA SUPERFUND SITE</i>	31
5.0	ALTERNATIVES & RECOMMENDATIONS.....	33
5.1	<i>ALTERNATIVES FOR THE SITE</i>	33
5.2	<i>ALTERNATIVES FOR WHOLE FOODS</i>	35
6.0	WORKS CITED.....	39
	APPENDIX A: BROWNFIELD OPPORTUNITY AREA (BOA) REQUEST FOR PROPOSAL.....	40
	APPENDIX B: MARSH AND FLOOD MAPS.....	52
	APPENDIX C: PHOTOS.....	55
	APPENDIX D: REDUCTION OF MANUFACTURING AREAS in NYC 2002-2007.....	57
	APPENDIX E: ENVIRONMENTAL MAPPING OF THE GOWANUS CANAL.....	58
	APPENDIX F: GOWANUS CANAL ADVISORY GROUP (CAG) RESOLUTIONS ON WFM.....	60
	APPENDIX G: ALTERNATIVE WFM DEVELOPMENT SITES.....	65



0.0 EXECUTIVE SUMMARY

This report presents information, findings and recommendations from a study conducted by the Gowanus Institute (GI) that reviewed Whole Food Market's (WFM) application to the New York City Board of Standards & Appeals (BSA) requesting a use variance (Cal. No. BZ-11-66) to develop a 58,000 SF UG6 retail food store, in an M2-1 zoning district where a maximum of 10,000 SF is permitted.

The Gowanus Institute concluded that the WFM variance application is flawed, and the proposed development will have a lasting negative impact on the manufacturing community of Gowanus and the surrounding neighborhoods. The Gowanus Institute urges NYC Board of Standards and Appeals to reject WFM's request for a variance.

WFM is requesting to modify a land use requirement that currently protects a scarce and diminishing resource: a property zoned for medium manufacturing, located on an active industrial canal, and within an Industrial Business Zone (IBZ). If built, the proposed development which is inharmonious with its environment, would substantially alter the essential manufacturing character of the Gowanus neighborhood, and is in contradiction to NYC's long-range goals to diversify its economy and increase higher paying jobs.

Over the past 10 years, the Gowanus neighborhood has become a haven for light and medium manufacturing as other manufacturing districts throughout NYC have been rezoned. Specifically, the area south of Third Street, where the proposed project is located, is at the heart of a thriving industrial community that includes maritime uses, and is within the Southwest Brooklyn IBZ, which the Mayor's policy has committed to preserving for manufacturing or related industrial uses.

The proposed development would consume a large manufacturing site that could be developed genuinely as-of-right with up to 370,000 SF for small to medium-scale manufacturing and could yield up to three times as many jobs with considerably higher pay than the proposed retail use. In fact, directly across the subject site on Third Avenue, is a multi-story light-industrial complex of 130,000 GSF that is fully occupied with approximately 80 industrial and commercial tenants employing more than 300 people.

In recent years, numerous academic and policy institutes' studies, reports and policy statements, including NYC Dept. of City Planning's (DCP) *Gowanus Canal Corridor Study* (2008) and the Gowanus Canal Community



Development Corporation's *Comprehensive Community Plan* (2006) , have encouraged growing the manufacturing activity in the Gowanus area, particularly on south side of the neighborhood which includes the WFM site. In October 2011, NYS Dept. of Environmental Conservation awarded a Brownfield Opportunity Area (BOA) grant of more than \$200,000 to Friends of Community Board 6, specifically to study the growing industrial activity along the Gowanus Canal and to map a sustainable, economically viable industrial future for the area dedicated to 'green' manufacturing. The WFM site is at the nexus of this BOA study area.

Further, in light of the working waterfront policy outlined in the NYC DCP's *Vision 2020 Comprehensive Waterfront Plan*, the extensive canal frontage of this site make it ideal for uses that utilize barging as the primary mode of transport, substantially reducing the amount of heavy truck traffic throughout the city. Several businesses are currently barging directly adjacent to the WFM site.

At the core of WFM's application is its *Statement of Facts and Findings*, which GI believes are flawed because WFM does not adequately prove the five findings. WFM claims that the site is "burdened by unique conditions" when in reality the site is typical of most sites along the Canal, and had active 'as-of-right' industrial uses on each of the parcels prior to WFM assembling its site. WFM's second claim of "economic hardship" is based an untenable, "as-of-right" plan that exploits FAR zoning criteria as a loophole, with a scheme that submerged all of the retail area well below grade where it is considered a 'cellar' and therefore not counted as floor area. As for "not altering the essential character of the neighborhood," an upscale food store would certainly be incompatible with the surrounding uses that include two large concrete producers, a large metal and car recycling facility and a paper/cardboard recycler, all of which are fundamentally different in use, noise, odor, and access requirements. Fourth, given that the site has accommodated a variety of conforming uses in the past, notwithstanding the soil and environmental challenges, it is only reasonable that this is in fact a "self-created hardship." The fifth and last point, the "minimum variance required" therefore, is irrelevant.

As part of its CEQR submittals, WFM presents a traffic study which projects only into the year 2012, the year prior to the store's projected opening. The study did not take into account any new major developments currently planned or in construction in the area. As proposed, WFM's development is clearly intended as a regional store to serve the broader region of the borough of Brooklyn, not a local one. As such, its modest projections of 64,100 car trips per week to the site - just one way - would certainly add a huge amount of traffic on Third Avenue (a narrow, two-lane truck route) and on Third Street, which has one of only two two-way bridges crossing the



Gowanus Canal, connecting Carroll Gardens to Park Slope. The vehicular traffic on most mornings is already intolerable. With new large projects in development just north of the WFM site, including, the Barclays Stadium and Atlantic Yards as well- high-rise residential buildings planned on Fourth Ave, the congestion on the avenues and side streets will surely be unbearable regardless of the changes proposed for the traffic signals. Further, the WFM site is located on the NYC Office of Emergency Management evacuation route for Carroll Gardens and Red Hook directed towards the hill of Prospect Park, hardly a prudent place to add additional daily traffic.

Environmental concerns with the WFM site are many and include: its location on former wetlands and within FEMA's Flood Zone A. Significantly, it is adjacent to the Gowanus Canal which was recently designated an EPA Superfund Site. The WFM site has more frontage than any other private property on the canal. There is real concern among the EPA's Community Advisory Group (CAG) that the proposed development might limit remediation options, as it might be disruptive to and delay the cleanup effort given potentially incompatible work plans. On December 5, 2011, the CAG formally requested that BSA postpone its decision on the WFM variance application until the EPA releases its Record of Decision on the Gowanus Canal cleanup plan.

At the end of this report, GI recommends alternative development plans for the site as well as alternative approaches and places for WFM to serve different neighborhoods throughout Brooklyn in a more 'local' way. Though the neighborhoods surrounding the site are well served by multiple, large organic and natural food stores (several established well before WFM first opened), GI recommends that WFM could better serve pedestrian shoppers from Park Slope by locating just one block east on Fourth Avenue, a wide, six-lane commuter route as part of an urban, mixed-use development, similar to WFM's Manhattan stores. If a regional store is WFM's only feasible business plan for the entire borough of Brooklyn with 2.5 million people, then an appropriate location should be sought to mitigate traffic impacts, for example near a wider boulevard or highway such as the Belt Parkway, BQE, Prospect Expressway, and near an exit ramp, as Costco, Home Depot and other large retailers are situated. The subject site is a mile or more from any highway.

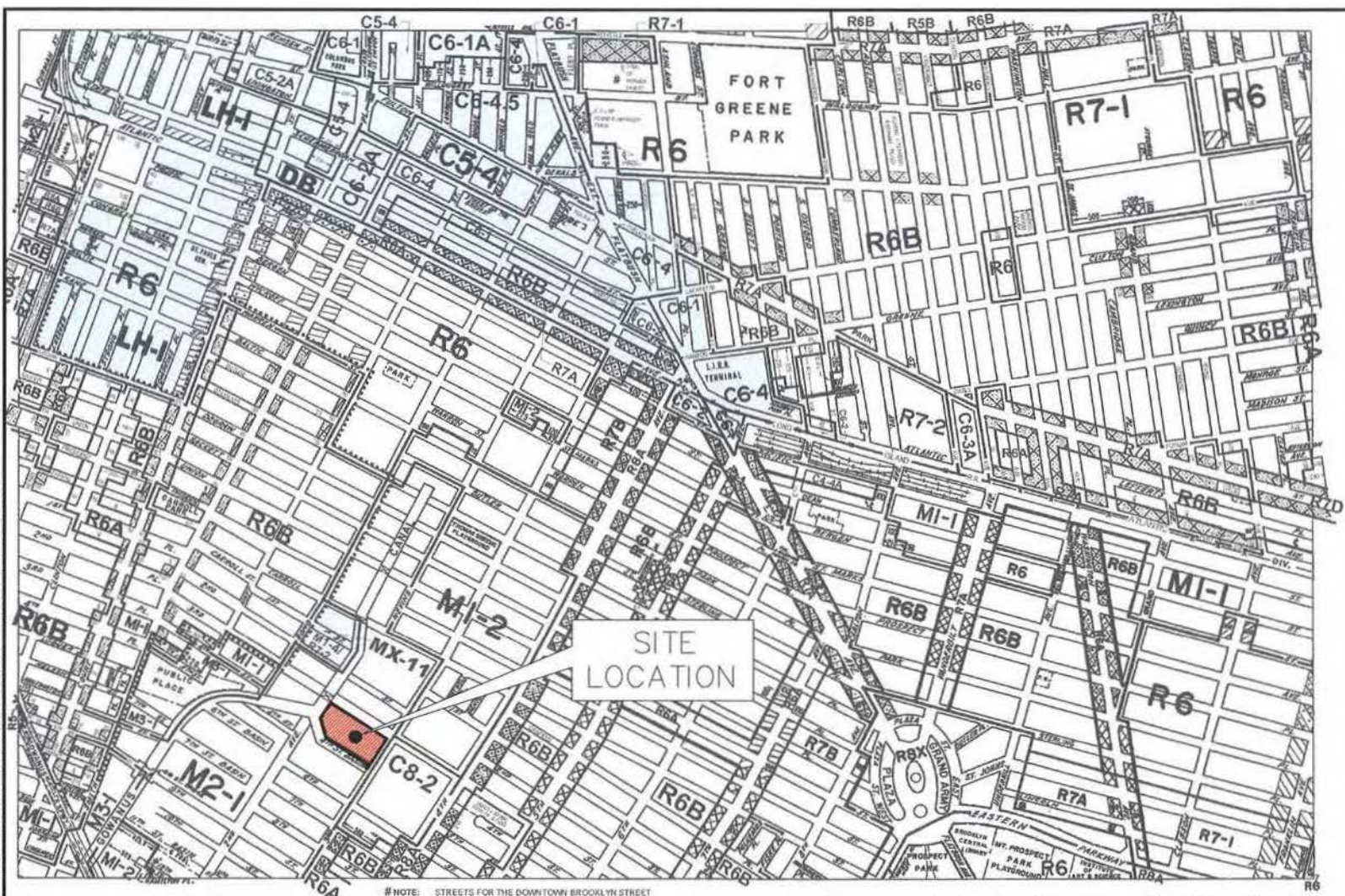
In conclusion, WFM's proposed project would be the largest development on the Gowanus Canal in years, set on the single largest private zoning lot. If this variance were granted and the WFM plan developed, it would set back decades of hard work to get the canal area growing as a fresh and thriving manufacturing community focusing on maritime uses, green manufacturing and the creative industries.



WHOLE FOODS BROOKLYN
BSA APPLICATION # BZ-11-66
PUBLIC HEARING TESTIMONY
13 DEC 2011 (REV 1.0) | PAGE 5 OF 66

0.1 SITE MAPS AND DRAWINGS

Xref (s): ; BD03C49702 ; XX03C49702 ; XC03C49701 ; XC03C49702



ZONING MAP

THE NEW YORK CITY PLANNING COMMISSION

Major Zoning Classifications:
 The number(s) and/or letter(s) that follows an R, C or M District designation indicates use, bulk and other controls as described in the text of the Zoning Resolution.

- R = RESIDENTIAL DISTRICT
- C = COMMERCIAL DISTRICT
- M = MANUFACTURING DISTRICT
- SPECIAL PURPOSE DISTRICT: The letter(s) within the shaded area designate the special purpose district as described in the text of the Zoning Resolution.
- AREA(S) REZONED

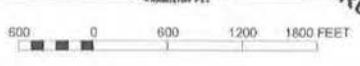
Effective Date(s) of Rezoning:
 1D-2B-2009 C 0904R2 ZMK

Special Requirements:
 For a list of lots subject to CEQR environmental requirements, see APPENDIX C.
 For a list of lots subject to "D" restrictive declarations, see APPENDIX D.
 For Inclusionary Housing designated areas on this map, see APPENDIX F.

MAP KEY

12b	12d	13b
16a	16c	17a
16b	16d	17b

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NOTE: STREETS FOR THE DOWNTOWN BROOKLYN STREET MAP CHANGES (C 030514MMX - C 030516MMX) ARE SHOWN ON THIS MAP PRIOR TO BECOMING EFFECTIVE IN ORDER TO LOCATE ZONING DISTRICT BOUNDARIES.

C1-1 C1-2 C1-3 C1-4 C1-5 C2-1 C2-2 C2-3 C2-4 C2-5

NOTE: Where no dimensions for zoning districts are shown on zoning maps, such dimensions are determined in Article VIII Chapter 4 (Location) of the Zoning Resolution.

NOTE: Zoning information as shown on this map is subject to change. For the most up-to-date zoning information for the map, visit the Zoning section of the Department of City Planning website: www.nyc.gov/planning or contact the Zoning Information Desk at (212) 720-3081.



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Item 08: ZONING MAP

WHOLE FOODS MARKET
214 3RD STREET
BROOKLYN, KINGS COUNTY, NEW YORK

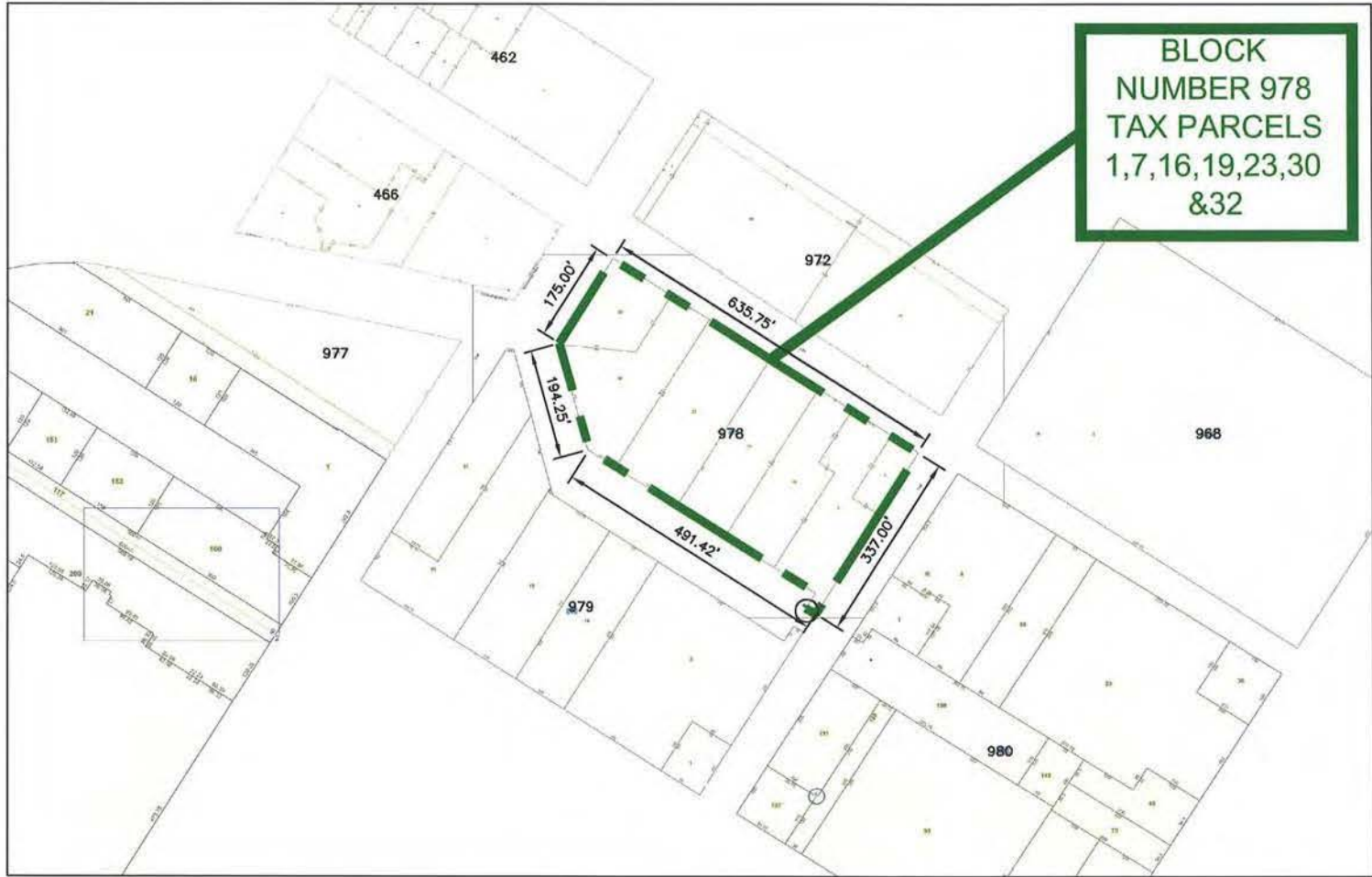


REVISIONS	No.	Date	Description
	1	1/25/2011	Submit to BSA

Designed: G.J.H.
 Drawn: G.J.H.
 Checked: M.W.H.
 Approved: AS: sth
 Project No: 03C497-H
 Origination Date: 3/01/2011
 File: BSA08.100-03C497-H

08.100

Xref (s): ; BD03C49702 ; XX03C49702 ; XC03C49701 ; XC03C49702



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Item 10: EXISTING TAX MAP

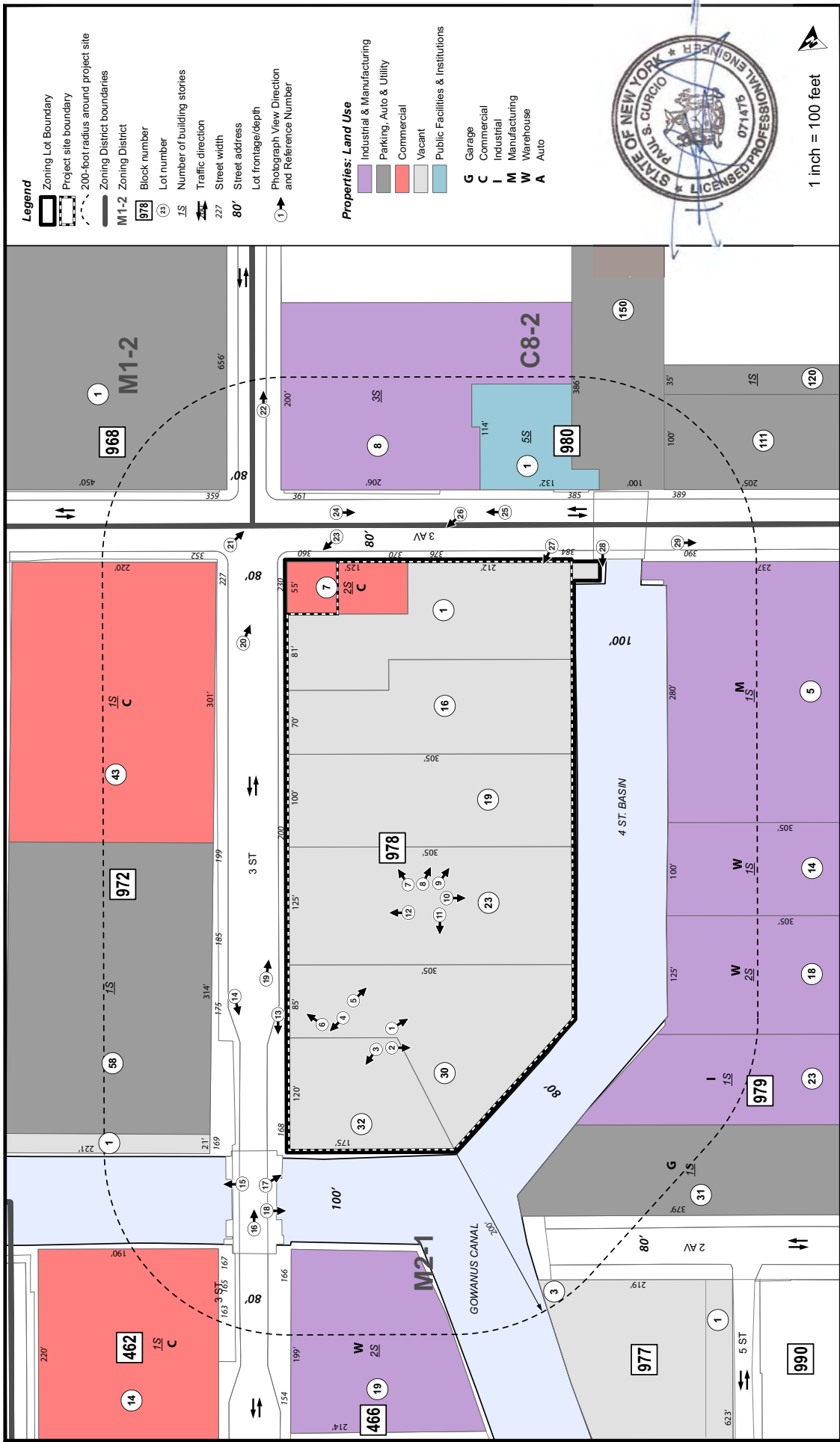
WHOLE FOODS MARKET
214 3RD STREET
BROOKLYN, KINGS COUNTY, NEW YORK



REVISIONS	Date	Description
	3/25/2011	Submit to BSA

Designed	G.J.H.
Drawn	G.J.H.
Checked	M.W.H.
Approved	
Scale	115=200'
Project No.	03C497-H
Origination Date	3/01/2011
File	BSA10.100-03C497-H

10.100



Legend

- Zoning Lot Boundary
- Project site boundary
- 200-foot radius around project site
- Zoning District boundaries
- M1-2 Zoning District
- Block number
- Lot number
- Number of building stories
- Traffic direction
- Street width
- Street address
- Lot frontage/depth
- Photograph View Direction and Reference Number

Properties: Land Use

- Industrial & Manufacturing
- Parking, Auto & Utility
- Commercial
- Vacant
- Public Facilities & Institutions
- Garage
- Commercial Industrial
- Industrial
- Manufacturing
- Warehouse
- Auto



1 inch = 100 feet

Item 11: RADIUS DIAGRAM
 WHOLE FOODS MARKET
 214 3RD STREET
 BROOKLYN, KINGS COUNTY, NEW YORK

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Designed: X.X.X.
 Drawn: X.X.X.
 Checked: X.X.X.
 Approved: X.X.X.
 Scale: 1"=50'
 Project No.: 03C497-H
 Origination Date: 3/01/2011

REVISIONS	No. Date	Description

Scale: 11.100

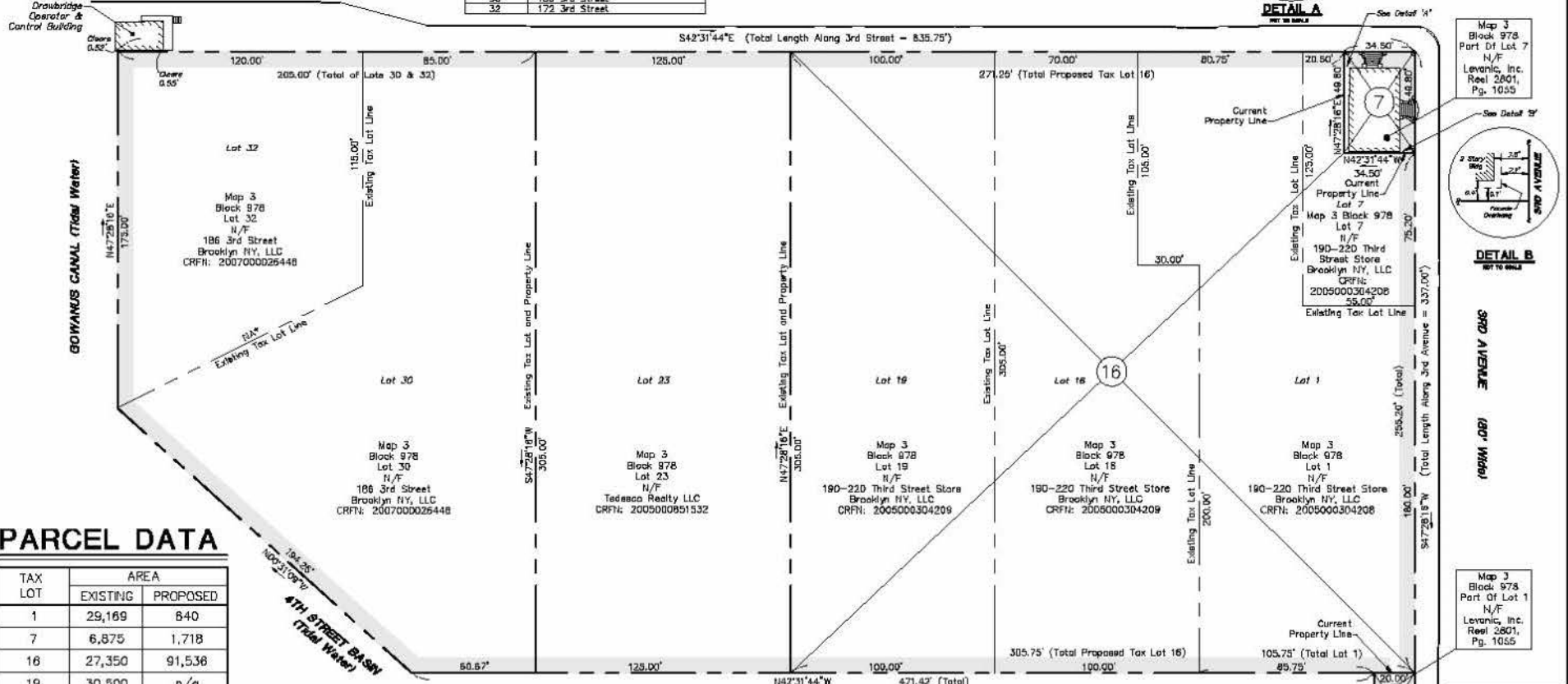
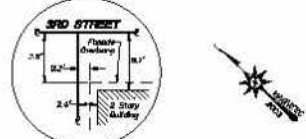
LEGEND

- Lot 1 Existing Tax Lot
- (16) Proposed Tax Lot
- MA* Tax Map Does Not Record Distance

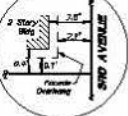
PROPERTY ADDRESSES

LOT NO.	STREET ADDRESS
1	220 3rd Street
7	230 3rd St. & 360-370 3rd Ave.
16	214 3rd Street
19	210 3rd Street
23	190 3rd Street
30	186 3rd Street
32	172 3rd Street

3RD STREET (80' Wide)



Map 3 Block 978 Part Of Lot 7 N/F Levania, Inc. Reel 2801, Pg. 1055



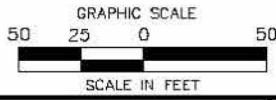
DETAIL B NOT TO SCALE

3RD AVENUE (80' Wide)

Map 3 Block 978 Part Of Lot 1 N/F Levania, Inc. Reel 2801, Pg. 1055

PARCEL DATA

TAX LOT	AREA	
	EXISTING	PROPOSED
1	29,169	840
7	6,875	1,718
16	27,350	91,538
19	30,500	n/a
23	38,125	38,125
30	35,744	35,744
32	17,400	17,400
TOTAL	185,163	185,163



TOTAL ZONING LOT = 185,163 S.F. OR 4.251 ACRES

March 25, 2011
ROBERT H. ROPER, P.L.S. NO. 50312



Xref (s) : BD03C-49702



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Item 13: TAX/ZONING LOT EXHIBIT

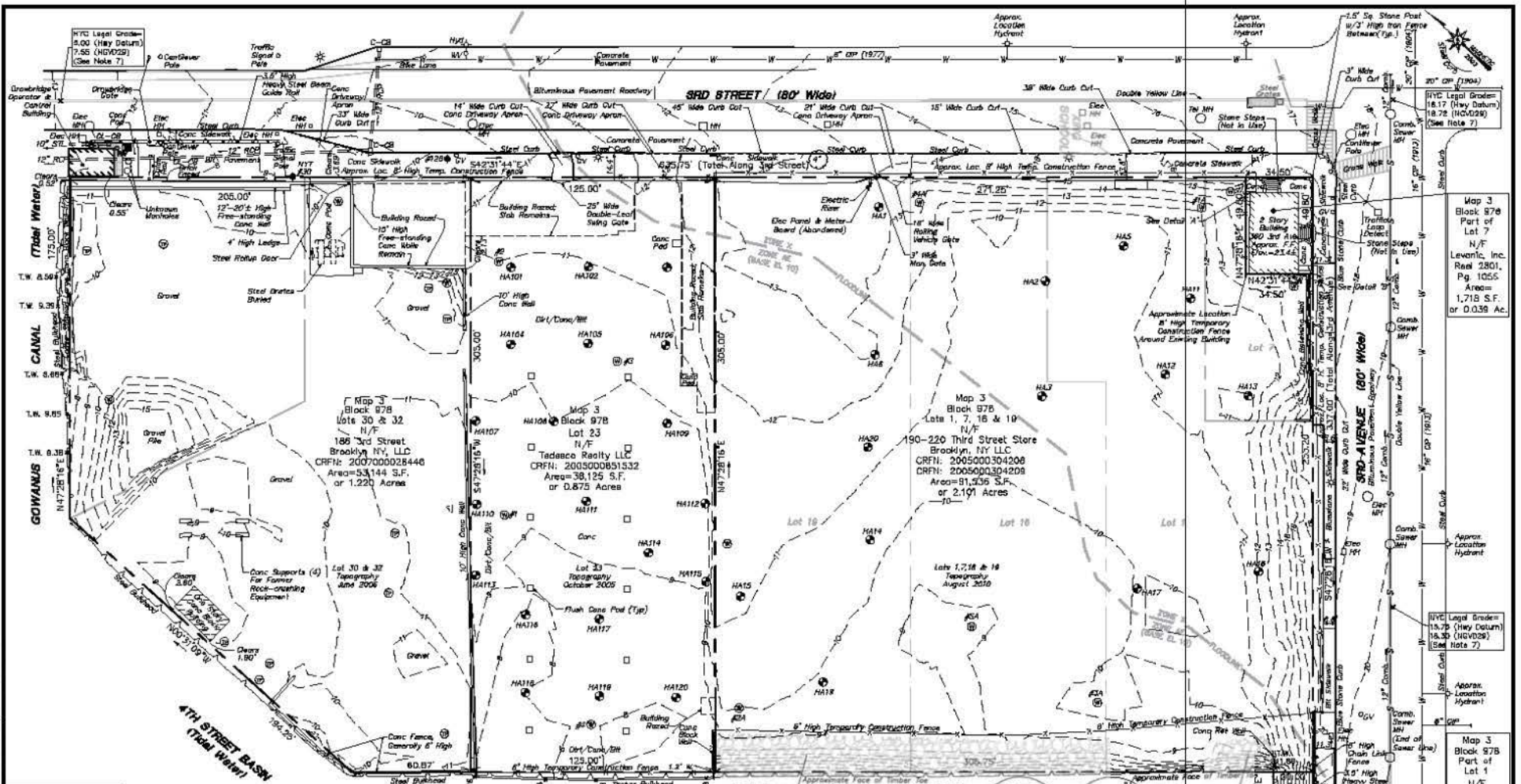
WHOLE FOODS MARKET
214 3RD STREET
BROOKLYN, KINGS COUNTY, NEW YORK

REVISIONS	Description
No. Date	
1 3/25/2011	Submit to BSA

Designed	J.S./R.K.
Drawn	R.H.R.
Checked	
Approved	
Scale	1"=50'
Project No.	BS3C-497-H
Origination Date	3/01/2011
File	BSA13.010-03C497-H

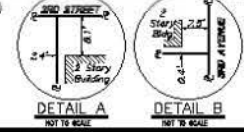
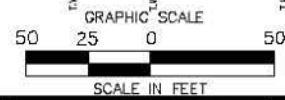
13.010

Xref (s) : BD03C49702 ; XX03C49702



NOTE: SEE DRAWING 13.110 FOR LEGEND, GENERAL NOTES, AND CERTIFICATION.

March 25, 2011
 ROBERT H. ROPER, P.L.S. NO. 50312



Map 3 Block 978 Part of Lot 7 N/F Levonic, Inc. Real 2801, Pg. 1055 Area= 1,718 S.F. or 0.039 Ac.

NYC Legal Graden 18.17 (Hy Datum) 18.28 (NGVD83) (See Note 7)

Map 3 Block 978 Part of Lot 1 N/F Levonic, Inc. Real 2801, Pg. 1055 Area= 640 S.F. or 0.015 Ac.



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Item 13: SURVEY/EXISTING CONDITIONS PLAN
1 OF 2

WHOLE FOODS MARKET
 214 3RD STREET
 BROOKLYN, KINGS COUNTY, NEW YORK

REVISIONS
 No. Date Description
 1 3/25/2011 Submit to BSA

Designed J.S./R.K.
 Drawn R.H.R.
 Checked
 Approved
 Scale 1"=50'
 Project No. 03C497-11
 Origin Date 3/07/2011
 File BSA13.100-03C497-H

13.100



LOCATION MAP

NOT TO SCALE

LEGEND

	Property Line
	Contour
	Chain Link Fence
	Temporary Construction Fence
	Bulkhead/Retaining Wall
	Guide Rail
	Water Line
	Sewer Line
	Gas Line
	Utility Pole
	Light Pole
	Hand Hole
	Catch Basin, Storm Sewer
	Manhole
	Hydrant
	Water Valve
	Gas Valve
	Sign
	Spot Elevation
	Test Pit
	Boring
	Well

MAP REFERENCE

ALTA/ACSM LAND TITLE SURVEY PROPERTY LOCATED AT 200-210, 212-214 3RD STREET AND 216-222 3RD STREET/ 360-70 3RD AVENUE KINGS COUNTY, BROOKLYN, NEW YORK SCALE 1"=20' DATE 9/30/2003 REV. 10/8/2003 SHEET NO. AL-2 BY BL COMPANIES MERIDEN, CONNECTICUT.

GENERAL NOTES

1. NORTH ARROW AND BEARINGS REFER TO MAGNETIC NORTH OBSERVED IN MARCH OF 2005.
2. ELEVATIONS AND CONTOURS REFER TO THE NATIONAL GEODETIC VERTICAL DATUM OF 1929 (NGVD29) BASED UPON USC&GS TIDAL BENCHMARK #KV0587.
3. LOCATIONS BASED UPON FIELD SURVEY BY BL COMPANIES IN MARCH OF 2003 (LOTS 1, 7, 16 & 19), OCTOBER OF 2005 (LOT 23), AND JUNE OF 2006 (LOTS 30 & 32). TOPOGRAPHY ON LOTS 1, 7, 16 & 19 UPDATED BASED UPON SURVEY BY OTHERS IN AUGUST OF 2010.
4. THE UNDERGROUND UTILITIES DEPICTED HAVE BEEN PLOTTED FROM FIELD SURVEY INFORMATION AND EXISTING DRAWINGS. THE SURVEYOR MAKES NO GUARANTEES THAT THE UNDERGROUND UTILITIES DEPICTED COMPRISE ALL SUCH UTILITIES IN THE AREA, EITHER IN SERVICE OR ABANDONED. THE SURVEYOR FURTHER DOES NOT WARRANT THAT THE UNDERGROUND UTILITIES DEPICTED ARE IN THE EXACT LOCATION INDICATED THOUGH THEY ARE PLOTTED AS ACCURATELY AS POSSIBLE FROM INFORMATION AVAILABLE. THE SURVEYOR HAS NOT PHYSICALLY EXPOSED THE UNDERGROUND UTILITIES. THE CONTRACTOR SHALL UTILIZE "CALL BEFORE YOU DIG", "ONE CALL", OR LOCAL EQUIVALENT, PRIOR TO EXCAVATION, FOR THE PURPOSE OF VERIFYING THE SUBSURFACE UTILITIES IN THE AREA.
5. REFER TO TAX/ZONING LOT EXHIBIT, DRAWING No. 13.010 FOR CLARIFICATION OF PROPERTY AND TAX LOT LINES.
6. PARCEL IS LOCATED IN FLOOD HAZARD ZONE X, AREAS OF 0.2% ANNUAL CHANCE FLOOD; AREAS OF 1% ANNUAL CHANCE FLOOD WITH AVERAGE DEPTHS OF LESS THAN 1 FOOT OR WITH DRAINAGE AREAS LESS THAN 1 SQUARE MILE; AND AREAS PROTECTED BY LEVEES FROM 1% ANNUAL CHANCE FLOOD, AND ZONE AE, SPECIAL FLOOD HAZARD AREAS SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD (100-YEAR FLOOD) WITH BASE FLOOD ELEVATION OF 10, AS DEPICTED ON F.I.R.M. MAP NUMBER 3604970211F, REVISED SEPTEMBER 5, 2007, CITY OF NEW YORK, NEW YORK, BRONX, RICHMOND, NEW YORK, QUEENS AND KINGS COUNTIES PANEL 211 OF 457.
7. LEGAL GRADE ELEVATIONS DEPICTED IN BROOKLYN HIGHWAY DATUM PER NYC LEGAL GRADE MAP, AND CONVERTED TO NGVD29 PER NEW YORK CITY ADMINISTRATIVE CODE SECTION 27-158 DATUM CONVERSION VALUE OF +2.647 FEET.

SURVEY CERTIFICATION

UNAUTHORIZED ALTERATION OR ADDITION TO A SURVEY MAP BEARING A LICENSED LAND SURVEYOR'S SEAL IS A VIOLATION OF SECTION 7209, SUBDIVISION 2, OF THE NEW YORK STATE EDUCATION LAW.

ONLY COPIES FROM THE ORIGINAL OF THIS SURVEY MARKED WITH AN ORIGINAL OF THE LAND SURVEYOR'S EMBOSSED SEAL SHALL BE CONSIDERED TO BE VALID TRUE COPIES.

CERTIFICATIONS INDICATED HEREON SIGNIFY THAT THIS SURVEY WAS PREPARED IN ACCORDANCE WITH THE EXISTING CODE OF PRACTICE FOR LAND SURVEYORS ADOPTED BY THE NEW YORK STATE ASSOCIATION OF PROFESSIONAL LAND SURVEYORS. SAID CERTIFICATIONS SHALL RUN ONLY TO THE PERSON FOR WHOM THE SURVEY IS PREPARED, AND ON HIS BEHALF TO THE TITLE COMPANY, GOVERNMENTAL AGENCY AND LENDING INSTITUTION LISTED HEREON, AND TO THE ASSIGNEES OF THE LENDING INSTITUTION. CERTIFICATIONS ARE NOT TRANSFERABLE TO ADDITIONAL INSTITUTIONS OR SUBSEQUENT OWNERS.

I HEREBY CERTIFY THAT THIS MAP WAS PREPARED BY BL COMPANIES, AND WAS MADE FROM AN ACTUAL FIELD SURVEY IN ACCORDANCE WITH THE CODE OF PRACTICE OF THE NEW YORK ASSOCIATION OF PROFESSIONAL LAND SURVEYORS.

DATED: March 25, 2011 SIGNED:

ROBERT H. ROPER, P.L.S. (NO. 50312)



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Item 13: SURVEY/EXISTING CONDITIONS PLAN 2 OF 2

WHOLE FOODS MARKET
214 3RD STREET
BROOKLYN, KINGS COUNTY, NEW YORK

REVISIONS	Description
No. Date	
1 3/25/2011	Submit to BSA

Designed	J.S./R.K.
Drawn	R.H.R.
Checked	
Approved	
Scale	1"=50'
Project No.	BS3497-H
Origination Date	3/01/2011
File	BSA13.110-03497-H

13.110



1.0 INTRODUCTION

This report presents information and recommendations from a study conducted by The Gowanus Institute that carefully examined Whole Food Market's (WFM) application to New York City Board of Standards & Appeals (BSA) requesting a variance (Cal. No. BZ-11-66, filed May 12, 2011) to allow them to construct a new 78,000 GSF regional food market at the southwest corner of Third Avenue and Third Street, a brownfield site abutting the Gowanus Canal with appx. 892 linear feet of bulkhead frontage, and zoned M2-1 for medium manufacturing use.

- Section 1 highlights key background information that is relevant context for understanding WFM's proposed development and variance request.
- Section 2 presents an analysis and critique of the shortcomings, errors and omissions of WFM's Statement of Facts and Findings, CEQR application, Economic Analysis Report and related procedural issues.
- Section 3 outlines the City's industrial development strategy, and how the WFM proposal is contradictory to the city's long term economic, workforce development and waterfront land use goals.
- Section 4 highlights the various environmental concerns confronting the site, particularly in light of the EPA Superfund cleanup process and climate change projections.
- Section 5 outlines alternative plans for the site itself as well as alternative locations and strategies for WFM to enter the Brooklyn market, suggesting pathways that would benefit both the Gowanus community and Whole Foods.

WFM is a decent company with a good mission "Whole Foods, Whole People, Whole Planet"...one that can have a promising future in Brooklyn. However, based on this detailed study and report as well as discussions with and feedback from various planners, community groups and other stakeholders, *the Gowanus Institute concludes that the WFM variance application is flawed, and the proposed development will have a lasting, negative impact on the manufacturing community of Gowanus and the surrounding neighborhoods in Brooklyn, is wrong for the people of Brooklyn, wrong for the planet and therefore wrong for Whole Foods.*

The Gowanus Institute urges the NYC Board of Standards and Appeals to reject WFM's request for a variance.



1.1 BACKGROUND

In 2004, WFM announced its intent to construct an "as-of-right" food market with a structured garage with a design scheme that did not require any public review or variance application since the proposal set 38,169 SF - the majority of the store - with more than 50% of its height below grade, thus rendering it a cellar and not counted as zoning floor area as a result. That scheme would have set the store's floor close to sea level in both a flood zone and in one of the most contaminated brownfields in the area. Doing so would have put much of the financial burden and legal liability on the taxpaying public, through the NYS Department of Environmental Conservation (DEC) Brownfield Cleanup Program, for the excavation and removal of contaminated soil that otherwise may have been remediated at a much safer, simpler and less costly approach. In the end, that scheme failed to work due to the costs and permitting associated with the plan. More than six years later WFM announced its current plan to build at or above grade for which it has applied for the variance.

In 2006, when WFM held its ribbon cutting ceremony, the NYC Department of City Planning (DCP) was beginning a study of the Gowanus Canal Corridor with intentions of rezoning a significant portion of the area north of the WFM site for mixed-use and residential use. Plans for several large-scale developments, including Toll Brothers' 460-unit market-rate residential development, Leviev-Boymelgreen/Africa-Israel's 450-unit *Gowanus Village* and the New York City/Hudson Companies' 774-unit *Gowanus Green* at Public Place were gaining momentum. The economy, with residential real estate development at its core, was beginning to balloon. In such a context, a large, upscale supermarket within steps of these projects seemed like a reasonable business plan, albeit incongruous with the existing zoning and neighborhood character. At the time, the plan was in keeping with similar planning and zoning changes throughout the city that favored residential development over manufacturing.

The recession, beginning in 2007 and continuing to this day, dramatically altered the development and environmental landscape across the country, as well as locally. Then, in 2010, when the Gowanus Canal was listed on the Environmental Protection Agency's (EPA) Superfund National Priority List, the combination of economic and environmental factors had DCP put its rezoning effort on hold, and all the planned residential developments along the canal have been cancelled or halted indefinitely.



In autumn 2011, the NYS Brownfield Opportunity Area Program (BOA) granted Friends of Community Board 6 a grant of more than \$200,000 to study how the area can be developed into a unique manufacturing center focusing on green technologies. The WFM site is the largest such property sitting at the heart of that study area (see APPENDIX A).

Meanwhile, the policy discussion in New York and throughout the country has shifted away from real estate development to economic development and diversification with a focus on job creation, especially in the manufacturing sector. The pause offered by the recession should be utilized to assess and re-evaluate the approach of the real estate boom years, which was never sustainable. It is in this significantly altered context that WFM's application should be reviewed.

1.2 GOWANUS PLANNING

There has been widespread recognition of the need for a comprehensive plan for the Gowanus neighborhood, one that takes into consideration the heavier industrial nature of the southern portion of the canal below Third Street while acknowledging the potential mix of uses along the northern portion of the canal. In all recent studies, however, the area south of Third Street is kept as industrial. Studies include the Gowanus Canal Community Development Corporation *Gowanus Canal Comprehensive Community Plan* (2006), the NYC Dept of City Planning's *Gowanus Canal Corridor Draft Rezoning Proposal* (2008), The Municipal Art Society's *Gowanus Rezoning Position Paper* (2009). Each of these proposals maintain the IBZ designation on the south side of Third Street and continue to indicate the WFM property as an M2 zone. Recent urban design studios at colleges and universities including Columbia University and Pratt Institute, have also made similar recommendations.

While New York City has created a burgeoning light industrial base over the past 20 years, it has simultaneously lost over 1,797 acres of zoned manufacturing sites, over 500 in Brooklyn, between 2002 and 2007 alone. The Gowanus area, as part of the Southwest Brooklyn Industrial Business Zone (IBZ), has been and is growing as an important refuge for light and medium manufacturers, artists, and artisans who are facing increasingly fewer places to work in the city. Only allowable M2 uses - or uses that support the IBZ's intent to "foster high-performing business districts by creating competitive advantages over locating (industry) in areas outside of New York City" — should be allowed on this site. Adherence to current zoning and policy protections would prevent real estate speculation that seeks higher dollar-valued uses, such as this upscale retail market. Land available for manufacturing is scarce, but commercial uses like food stores are permissible as-of-right in most zoning districts.



A single commercial entity, such as the proposed WFM development, could have a disproportionate impact on the DCP's future land use and rezoning considerations.

1.3 WRONG FOR THE PEOPLE AND WRONG FOR THE PLANET

WFM is a mission-driven company with the motto: "*Whole Foods, Whole People, Whole Planet.*" However, their proposal lacks an understanding of the people in the community, their needs, and therefore how to create a sustainable, community-oriented store in Brooklyn. If the proposed development moves forward with a BSA-granted variance, WFM would be negating its own "Whole Planet" mission by bringing car-oriented shopping into an area accustomed to pedestrian-oriented environment. WFM needs only to look at Park Slope and Carroll Gardens—the immediately surrounding areas—to find the birthplace of organic, healthy grocery stores in this country (four of them were founded in the 1970s and are flourishing today). They are predominately neighborhood stores that are embedded in the residential fabric, including two Union Markets, Park Natural, the Park Slope Food Coop, Back to the Land and Perilandra among innumerable smaller such stores. In this dense, urban context, residents walk to their stores and buy relatively small purchases at a time. WFM itself has built pedestrian-oriented, community stores throughout Manhattan. In Section 5.2, this report recommends several ways to bring Whole Foods to Brooklyn in a more contextual way.

In terms of increased traffic and increased pollution, WFM projects that the store will generate approximately 64,100 car trips per week, and that's just one way. As the site is not well served by public transportation for regular food shopping, with the nearest bus and subway stops at least a 10-minute walk away, it is certain that most shoppers would drive, rather than walk, to this store. The site is located along an essential two-lane trucking route as well as a storm evacuation route for Carroll Gardens and Red Hook. WFM recommends additional traffic lights to handle the additional traffic, but the industrial community in the surrounding area will be burdened with additional traffic as well as increase trucking times. On a daily basis, the increased traffic would make it more difficult for companies such as cement mixers to meet their 45- minute mix-to-pour window to construction sites throughout the five boroughs. In the event of an emergency, a highly trafficked store and parking lot could impede safe evacuation. As the store would lack access to public transportation and is more than a mile from a highway entrance, it will have negative traffic impacts for Brooklyn residents and industrial uses alike.



The bottom line is that WFM is asking for permission to change a requirement that currently protects a scarce and diminishing resource - a property zoned for medium manufacturing - replace it with a use that does not contribute to the manufacturing sector, is inharmonious with its environment, and the community and the city's broader long-range economic goals.

Gowanus, as a thriving and growing manufacturing district, should be protected against encroaching uses that diminish its viability as a productive industrial area.



2.0 WFM'S VARIANCE APPLICATION

WFM's application for a use variance to construct a food store greater than 10,000 SF contrary to use regulations of the M2-1 zoning district. The burden of responsibility is on WFM to prove the Five Findings, per zoning resolution §72-21. GI believes that WFM fails to adequately establish each and every one of these findings required for BSA approval.

2.1 STATEMENT OF FACTS

WFM Statement of Facts contain the following errors and omissions:

- Page 3: Lots 1, 7, 16, 19 are described to include at a "freight depot" which was in fact was a large vehicle radiator manufacturer and repair company, a manufacturing use.
- Page 8: Neighborhood Context describes the American Can Company Building as occupied primarily by offices and artists' studios. In fact, the majority of tenancies are engaged in production in the creative industries and light manufacturing uses.
- Page 8: Describes "across the Site are vacant former industrial sites." In fact the entire property opposite the site across Third Street is occupied by Verizon.

2.2 STATEMENT OF FINDINGS

2.2.1 FINDING I: *Uniqueness of the Site*

WFM CLAIMS:

The site has a unique size, shape, location, history of development, surface elevation and subsurface soil condition and is "the only lot in these zoning districts and indeed, in the larger neighborhood to be burdened by this set of unique conditions," therefore creating "practical difficulty and unnecessary hardship." The unique conditions mentioned in the Statement of Findings include:

- Urban fill unsuitable for load-bearing materials
- Location within the 100-year flood zone and a high water table require extensive dewatering and waterproofing for an as-of-right (below-grade) development.
- A substantial grade change (12') on the site
- Special considerations due to two bridges and a historic structure.



WHAT'S WRONG AND/OR MISSING:

In fact, the site difficulties WFM mentions are typical of all of the properties surrounding the Gowanus Canal.

- Any site along the Gowanus waterfront would require pile work for larger construction. As a former marshland, urban fill is the predominant soil condition along and around the Gowanus. All sites abutting the canal have a high water table and are located within the 100-year flood zone. (See APPENDIX B, Map 1 of original creek and marsh). The seven-section can factory complex across the street from WFM site is entirely built on piles and rises up to six stories high.
- A 12' change over a 635' long property amounts to an average of less than a ¼ inch per foot slope. This is hardly a "substantial" grade change. Much steeper slopes throughout the neighborhoods of Carroll Gardens and Park Slope have not impeded development. Prior to WFM acquiring the site, it was home to manufacturing, as-of-right uses similar to those found throughout the Gowanus M-2 areas. Such physical conditions did not prevent it from having an active as-of-right manufacturing use until WFM acquired the site.
- The bridge on Third Avenue was entirely replaced by DOT in 2010 and since then, has enhanced, not diminished, the site conditions of the WFM property.

THE TAKEAWAY:

The WFM site is not unique, and is in fact typical of this area, and should be developed in a genuine as-of-right method.

2.2.2 FINDING II: *Reasonable Rate of Return*

WFM CLAIMS:

The Economic Analysis Report claims as-of-right developments (a 6-story warehouse, a two-story warehouse, a retail store or a below grade grocery store) would contain significantly less value than the total development costs, therefore the applicant would not earn a reasonable return. The development options presented in the original submission were:

1. As-of-right Warehouse Development - Scheme 14A
2. As-of-right Food Store (DOB approved, below grade) - Scheme 14B
3. As-of-right Food Store - Scheme 14C
4. Proposed Development - Scheme 15



At the request of the BSA, WFM added three other as-of-right development options:

5. As-of-right Retail Development - Scheme 14D
6. As-of-right Warehouse (2 fl, max FAR) - Scheme 14E
7. A lesser variance with complying parking and landscaping - Scheme 14F

WHAT'S WRONG AND/OR MISSING:

Throughout their application, WFM describes their "as of right" development as a below-grade supermarket that skirts the zoning floor area requirements but is unbuildable, as shown in their feasibility study and by DOB rejection of their plans. It is unclear why this is a legitimate as the as-of-right condition for the economic analysis and CEQR reports.

- WFM describes the area as a heavy industry district, not a warehouse district. However, the only "industrial" option presented is a Warehouse option. Warehouse rents (\$12/SF according to Freeman/Frazier) are typically below rents for quality manufacturing space. Smaller- to medium-sized manufacturing spaces in a well-maintained building (even multi-story) command rents of \$15-24/SF in the Gowanus area. Given that out of the 5.34 million square feet of industrial space along the Gowanus Canal, 58% is used for production, a reasonable option—a manufacturing development—was excluded from the report.
- There is no mention of the fiscal implications associated with the role of the NYSDEC Voluntary Clean-up program, which offers WFM tax credits for the costs of remediation.
- It is unclear why a retail store would be unfeasible but the proposed development would be economically sound.

THE TAKEAWAY:

GI urges a most stringent review of WFM development options for their financial legitimacy. Further careful consideration should be given as to whether a development scheme that exploits a zoning FAR criteria as a loophole by using below-grade space to limit its zoning floor area as a valid "as-of-right" comparable for proving the "reasonable rate of return" finding. WFM picked a questionable use that is technically but not realistically reasonable, and possibly disingenuous. A bad business plan should not satisfy the economic hardship finding.



2.2.3 FINDING III: *Alter Essential Character of the Neighborhood*

WFM CLAIMS:

The new store will not alter the essential character of the neighborhood, which is described as a “heavy industry area currently characterized by large, underutilized industrial properties, old factory and storage buildings and most notably, the Gowanus Canal and a series of extensions.” WFM argues that grocery stores are already permitted as of right. “It is only the proposed configuration that requires a variance.”

WHAT'S WRONG AND/OR MISSING:

- Directly adjacent to the lot, MLV Concrete—one of the three concrete producers nearby—mixes concrete on site. Mixer trucks and heavy delivery trucks constantly are coming and going. Proximity to their clients is paramount, with only a 90-minute window mix-to-pour time. Dorann Resources, just south of the site across the 4th Street Basin, crushes and recycles cars and large metal objects day and night. US Recycles processes cardboard and paper. Other neighbors include Dykes Lumber, the Old American Can Factory, and Verizon, which are all active industrial uses. WFM's potential neighbors are fundamentally different in use, noise, and access requirements.
- Simply because an area is underbuilt with respect to zoning FAR does not mean it is underutilized. In fact, the appearance of underuse relates to use type. Many of the existing active industrial uses in Gowanus (warehousing, trucking, bus depots, etc.) require single-story warehouses and open lots in order to do business. The Gowanus Canal has 1,880 linear feet of vacant shoreline, accounting for 11% of the total linear footage of canal—not an exceptionally high vacancy percentage and likely inflated due to developments like WFM have property owners speculating that another retailer or residential use will buy their property.
- All recent studies, including DCP's draft rezoning, point to mixed uses occurring along the part of the canal north of Third Street. In all studies, the area South of Third Street is kept for medium-level manufacturing.
- There are no retail uses within 400' of the site.

THE TAKEAWAY:

A new regional-scale retail food market at Third Street and Third Avenue would unquestionably alter the essential character of this heavy and medium industrial area neighborhood located within the Southwest Brooklyn Industrial Business Zone, creating conflict between a food store and the noisy, dusty industrial neighbors. It would also exacerbate the real estate speculation already present in the neighborhood.



2.2.4 FINDING IV: *Self-Created Hardship*

WFM CLAIMS:

Due to the uniqueness of the site, the conditions were not created by the owners or predecessors but are inherent to the site.

WHAT'S WRONG AND/OR MISSING:

While it is true that the owners did not create the hardship or site conditions, it is also true that they are not unique to the site.

- In two past variance requests along the Canal (130 Third Street #241-02-BZ and 460 Union Street #75-02-BZ), the BSA has rejected the proposals because the applicant failed to provide substantial evidence that indicate unique physical conditions that prevent developing the site in strict conformity with the current zoning.
- The site is only vacant since WFM acquired the land. The previous businesses closed or moved away and buildings and their buildings demolished. Prior to 2004, the properties were active with industrial uses, and included Red Hook Crushers, All Boros Building Materials and storage, and Pipin Radiators.
- The development was begun during a period of real estate speculation (average sale price per GSF rose 250% between 2003 and 2007, according to a 2011 report from Baruch College's Newman Real Estate Institute) that ultimately led to the current real estate slump. WFM's plan should therefore be considered a self-created hardship.
- The fact that the site is located in a 100-year flood plain also indicates that this is a self-made hardship, especially since placing buildings below grade and near sea level is not good practice for floodplain development. The purchase and design for such a scheme either lacked due diligence or was purchased with the intent of requesting a variance (see APPENDIX B, Map 2 of flood zone).

THE TAKEAWAY:

While the site may provide hardship for a landowner trying to construct a large retail food market—a specific business plan which was envisioned during a period of intense real estate speculation—it has accommodated a variety of conforming uses in the recent past, and can continue to do so today with more productive conforming industrial uses.



2.2.5 FINDING V: *Minimum Variance Necessary*

WFM CLAIMS:

To show that they are requesting the "minimum variance necessary," WFM points to the fact that (1) the total development costs are approximately equal to the total value, (2) it utilizes only a small percentage of floor area available, and (3) is "slightly larger than an as-of-right store."

WHAT'S WRONG AND/OR MISSING:

In fact, WFM is requesting a variance that will allow them to build 580% larger than the allowable 10,000 SF grocery store. - This is not "slightly" larger than allowable, though they are referring to slightly larger than their unbuildable, not-quite "~~as-of-right~~" scheme.

THE TAKEAWAY:

Since the other four findings are not established, it is irrelevant if they are requesting the minimum variance required.

2.3 CEQR AND OTHER SUPPORTING MATERIAL

The supplemental materials submitted in support of the variance application fail to fully acknowledge the impact of the WFM proposal on the Gowanus neighborhoods, and include various other omissions and errors. In general, the supporting documents underestimate the impacts of the proposed development on the industrial character of the neighborhood, on traffic and on the environment. More specifically:

2.3.1 Economic Analysis Report (Freeman/Frazier & Assoc):

- Presents six development options, and claims that only one—the requested variance option—is economically feasible. Can it be true that only the proposed food market development is the only use that could be profitable on this site? Such assertions cast doubt on the validity on the entire report.
- Claims that an as-of-right retail store (Scheme 14D) with the same basic dimensions of the proposed food store development (Scheme 15) would not be economically feasible. However, the retail option shows the building located at 14' FFE, rather than 18' FFE, presumably impacting the cost analysis.
- Puts the DOB approved "Commercial Development" option (Scheme 14B) at FFE of 9.47' and the As-of-Right option (Scheme 14C) at FFE 7.52', presumably affecting the costs analysis.



- In general, WFM uses average rent assumptions that are low. The site, located on one of just two 2-way bridges on the canal, increases the estimated rent values, particularly to traffic dependent uses.
- Does not include an alternative manufacturing use, despite the fact that the site had a range of as-of-right manufacturing uses prior to WFM assembling and purchasing the land, and manufacturing uses make up 58% of uses along the Gowanus Canal. WFM should be required to submit this option in a revised Economic Analysis Report
- Does not include a “true” as-of-right market development (i.e. a 10,000 SF market).
- Does not mention tax credits WFM would receive from its participation in NYSDEC’s Voluntary Brownfield Clean Up Program in the site preparation/pre-development costs, and subsequently not reflected in their "hardship" claim.

2.3.2 CEQR Environmental Assessment Statement (BL Companies):

- Claims that there would not be sufficient socioeconomic changes to the area enough to warrant a Socioeconomic Assessment. However, WFM would adversely affect certain types of businesses, specifically industrial businesses, and thus a socioeconomic assessment may seem warranted.
- Incorrectly checked “NO” in response to the question (Section 10e) about whether the development will increase the amount of impervious surface in a drainage area of special concern. It will.
- Why were they were not asked to do an EIS?

2.3.3 CEQR Traffic Study (Eng-Wong, Taub & Associates):

- Extends the projected future conditions out to less than 1 year (until 2012). It is unclear why it is not further. By only looking at the immediate future, the study fails to capture meaningful data about the true impact of the store on residents and businesses in Park Slope, Carroll Gardens, and Cobble Hill and Boerum Hills.
- Given the lack of adequate public transportation in the area, the rezoning and new and proposed developments along 4th Avenue and most significantly, Barclay Stadium and Atlantic Yards, seems to underestimate the impacts.
- Misrepresents the amount of public transit, as bus #103 does not stop within a ¼ mile radius of the site, despite traveling along 3rd and 4th Avenues. Bus #37, which traveled along Third Avenue, was suspended approximately one year ago. This means that there is no public transportation within a 10 minute walk. One can therefore logically presume that nearly all of the shoppers will drive to the store, congesting both Third Avenue and Third Street, both of which are just two lane roads.



- Uses the "as-of-right" supermarket scheme as a baseline as-of-right condition used, which, as WFM asserts, is not economically feasible, and therefore, seems to be irrelevant as a point of comparison.
- Does not consider the impact on the city's trucking system or on the industrial businesses depended on ease of trucking. Third Avenue is a two-lane trucking route, not a commuter road.
- WFM's projection of 64,000 additional cars per week is unacceptable, and adding a traffic light in the middle of Third Street at the entrance may help customer traffic but would certainly slow down general traffic on Third Street.

2.3.4 CEQR Technical Analysis (AKRF):

- Is vague about whether the site is located in the Southwest Brooklyn Industrial Business Zone OR an Industrial Ombudsman Area. It is located squarely INSIDE the IBZ. As IBZ's are areas that the city has committed to protect as manufacturing districts, this is a critical distinction.

2.4 PAST DECISIONS BY BSA

A search of past BSA variance decisions revealed that no new supermarket construction in manufacturing districts has been reviewed by the BSA since 1992 , whereas numerous examples have been reviewed through ULURP to be granted zoning amendments or Special Permits. It is unclear why this case is an exception.

Along the Gowanus Canal, the BSA has, in recent history, rejected non-conforming uses. In the decisions for 460 Union Street (75-02-BZ) and 130 Third Street (241-02-BZ), the Board rejected proposals because they failed to meet the five findings required. In the Board's decision on 130 Third Street, it was found that:

The applicant failed to provide substantial evidence that the subject lot possesses unique physical conditions that create practical difficulties and unnecessary hardships in developing the site in strict conformity with current zoning.

And that:

The site is within, and relates to in terms of character, a viable M2-1 manufacturing area that extends east from Bond Street across the Gowanus Canal to approximately 3rd Avenue, with blocks occupied predominately by conforming uses;



Likewise, the Board makes similar findings at 460 Union Street, including the observation that:

That no substantial, undisputed evidence has been provided showing that a significant proportion of lots within the area are vacant or underutilized as applicant alleges.

Both decisions concluded that: “the actions will alter the essential character of the surrounding neighborhood and that the application therefore fails to meet the finding set forth in Z.R. §72-21.”

Likewise, WFM’s application fails to meet the required criteria for unnecessary hardship, essential character and unfounded claims of vacant land, as the site does not have unique conditions, the upscale food store is out of character with the industrial neighborhood, and the site is only vacant since WFM acquired it.

2.5 PROCEDURAL ISSUES

Given the scale and importance of this variance request to the surrounding neighborhoods as outlined above, WFM should have invited some public discussion with the community in the past six years. Unfortunately, such a discussion did not take place and WFM hid behind its below-grade "as-of-right" scheme until now.

Recently, with the variance application process underway, WFM presented its current scheme to the Land Use Committee of Community Board 6 followed by the Land Use Committee presenting its recommendation to the full CB for a vote. Barely a week’s notice was given to the public about the review of the proposal by the Land Use Committee, hardly time to allow for genuine public involvement. At neither the Land Use Committee meeting nor at the full Board meeting were the five findings discussed or debated. At the full CB6 board meeting held in June to vote on the project, inadequate presentation materials were shown (an image of the site plan was held on an 11x17 piece of paper in front of a large, crowded church hall - See APPENDIX C, lmg 1), basic facts about the WFM proposal were misrepresented by the Land Use Committee chair, and there was little time for the Board to actually -review or discuss the proposal. Members of the general public were not allowed time to comment.



3.0 NEW YORK CITY'S ECONOMIC & JOB DEVELOPMENT VISION

Given the long-term economic challenges facing New York City—finding answers to high unemployment; creating employment opportunities to support the expected one-million new residents by 2030; reducing income disparity; becoming less reliant on the financial sector — there is clearly a need for sustaining and producing high quality, good-paying jobs. Mayor Bloomberg is emphasizing economic diversity with a focus on small and medium-sized manufacturing firms calling them "vital to the economic recovery of the city." Preservation of and support for the city's shrinking industrial land base to foster such businesses is critical to this mission.

3.1 THE NEED FOR QUALITY JOBS

Industrial jobs are quality jobs. According to the 2005 NYC Industrial policy report, industrial jobs make up over 25% of all private sector jobs outside of Manhattan and have a mean wage of \$64,000 per year. Non-college graduates comprise 75% of the industrial workforce at middle income wage, compared to 60% of the overall private sector workforce. Fiscally, the sector contributes more than \$1.7 billion to the City annually in direct tax revenue, with new companies continuing to enter the market. These are the types of jobs needed in Brooklyn, and are already found throughout Gowanus. These are the types of jobs that could be created legitimately as-of-right on the WFM site.

3.2 THE CITY'S INDUSTRIAL POLICY

In June 2011, the Mayor and the City Council outlined a new industrial strategy with 22 policy initiatives aimed at strengthening New York's industrial sector and helping small industrial business stay and grow in New York. These initiatives were based on an interagency review which found that New York City offers "unique location based advantages for industrial activity, including a population of about 8.4 million, access to a large workforce and highly-skilled labor, and one of the nation's busiest ports based on import volume." The review also found that "industrial businesses...are challenged by a lack of building stock appropriate for modern industrial uses, higher costs, and difficulty maneuvering City processes." The 22 initiatives fall under several categories:

3.2.1 **Strengthening Industrial Business Zones:** The first goal is to, "increase access to modern industrial spaces and strengthen Industrial Business Zones." IBZs were established by the Bloomberg Administration as a way to identify and protect certain manufacturing areas from real estate uncertainty. The designation is meant to "protect and stimulate the supply of industrial space," and includes incentive programs that are dedicated to assisting manufacturing business in New York through grants and tax incentives. The WFM site is located in the Southwest Brooklyn IBZ.



3.2.2 **Supporting industries with growth potential:** The City's industrial strategy also identifies industrial sectors that offer real opportunities for growth and development: Food-related manufacturing, artisanal manufacturing, building and construction, and emerging sectors, such as green technology.

3.2.3 **Increasing access to modern industrial space:** With costs of manufacturing offshore rising and growing knowledge on the impacts of climate change, the U.S. needs to boost exports and modernizing manufacturing is more important than ever. Regarding the City's industrial initiatives, Adam Friedman, Director of the Pratt Center for Community Development, which provides technical services, research and marketing assistance to New York manufacturers, said:

"The initiatives announced today are important building blocks in the creation of a modern manufacturing. Renovating and right-sizing space, promoting high-design, high-value sectors that provide quality jobs, and moving to strengthen zoning protection of valuable manufacturing land are important steps toward ensuring that the sector can thrive and grow in New York City."

Between combating climate change, promoting entrepreneurship and supporting the middle class, making things in New York makes sense for New Yorkers.

3.3 GOWANUS WORKS

The Gowanus area is already a model for implementing the city's job growth strategies, industrial policy and sustainability goals as outlined in the Mayor's Industrial Policy and in PlaNYC. To realize the city's employment goals, the area must remain a thriving, innovative manufacturing district. The WFM site, located within the Southwest Brooklyn IBZ, sits at the heart of the Gowanus industrial area. And it is clear that, due to the site's sheer size and location along the canal, its development will set a precedent for and have a great effect on future land uses in the area.

The Gowanus area—and the WFM site in particular—is an ideal place for enacting the city's policies in the following ways:

3.3.1 **An Innovative Employment Center:** In addition to being located in the Southwest Brooklyn IBZ, the Gowanus area is already home to innovative development models. "Micro-industrialization"—where large, single-use buildings have been subdivided into smaller units—flourishes. For example, directly across the street from the



- WFM site, the Old American Can Factory, a former canning facility, has been transformed into workspaces for small businesses and manufacturers, artisans, artists and non-profit groups. The 110,000 usable SF in that building employs over 300 people. By that account, a true as-of-right development on the WFM site of a similar format could accommodate approximately 1,000 workers and small business owners, many times more than the proposed WFM store, and those would generally be higher paying jobs by local companies that do more to further support the local economy.
- 3.3.2 **Home to Growth Industries:** The Gowanus area is also already home to many industries that the city identified for growth potential, including: public cold storage warehousing, back office food processing facilities, furniture-making and wood-working, metal fabrication, design, green product manufacturing, bio and high-tech product development and R&D. Many of these companies are hybrid uses, with on-site production, showrooms and even retail space. They often occupy harder to fill second floors and, as they require less space, can get premium rates for less square footage.
- 3.3.3 **An Important Industrial and Environmental Resource:** The Gowanus Canal is still an active industrial waterway. Continued barging on the Gowanus helps reduce our carbon footprint by eliminating the equivalent of over 200,000 truck trips from our streets and highways. With a connection to the city's waterborne transportation systems, the WFM site among others nearby, offers an opportunity to increase barging-based industrial and commercial businesses.
- 3.3.4 **Location advantages:** The Gowanus Canal area is also home to a high concentration of existing industrial activity that still remains relatively isolated from residential neighborhoods, which keeps noisy, noxious uses out of conflict with residential life. However, it has good accessibility to multi-modal transportation network, including major commercial transportation routes such as the BQE, Hamilton Avenue, the Brooklyn Battery Tunnel, as well as the Canal itself, which allows for ease of transport for trucks and boats. Industrial businesses would be negatively impacted by the increase customer traffic created by a large retail store.
- 3.3.5 **As-of-Right Manufacturing:** It is difficult to find large vacant parcels, such as the WFM site, for industrial uses. These sites should be maintained for industrial use. Furthermore, given the trends of upzoning waterfront properties over the past 10 years, the need to preserve manufacturing zoning along the Gowanus Canal becomes even more acute. According to a 2008 study by the Pratt Center for Community Development, there were 12,542 acres of property where manufacturing could legally take place in 2002, which shrunk to 10,746 by 2008, with an



additional 1,800 acres proposed for rezoning (see APPENDIX D). Additionally, none of the 95 rezonings between 2003 and 2008 added a single acre of manufacturing space. If the proposed rezonings go through, it will mean a 20% decrease in the amount of manufacturing space citywide in less than 10 years. The Gowanus area is a refuge for businesses forced to relocate from other parts of the city that have been or will be rezoned.

3.4 ADVANTAGE OF MANUFACTURING VS RETAIL JOBS

WFM's proposal is in direct contradiction to keeping Gowanus as a quality industrial job center, especially for small businesses. And as for the quality of jobs proposed by WFM: according to a report done by CNN Money in 2006, the most common hourly job at Whole Foods, a prepared foods team member, makes only \$25,451 annually, which is much lower than the city's \$64,000 average industrial wage.

Furthermore, a variance that would allow a large retail use within this district would have a disproportionate impact on the area and trigger retail development on a large scale. Already, despite industrial vacancy rates remaining at 3%, real estate speculation is widespread due to the anticipated rezoning of the area north of Third Street. Since 2003, costs for non-residential properties have risen faster than residential properties, reflecting speculation about the rezoning of the canal for residential use. In 2003, the average sale price was \$108 per GSF, whereas in 2007 it had risen two and a half times to \$270 per GSF. Even within the Industrial Business Zones, non-manufacturing uses have snuck in. A recent study by the New York Industrial Retention Network (NYIRN) identified 39 new non-industrial uses in 7 of the city's 16 IBZ's, despite their presumed protected status. Such inconsistency creates market speculation, inflating real estate prices and thus making it impossible to purchase or lease land for new industrial development at an affordable price.

Because of these external real estate pressures, it is all the more important that the WFM site, as part of the Southwest Brooklyn IBZ, be preserved and protected for manufacturing use and for innovative ways to grow quality jobs.



4.0 ENVIRONMENTAL ISSUES

The WFM site is highly vulnerable due to a myriad of environmental conditions. Unfortunately, the current design proposal fails to fully address the complexity of the site and fails to take into consideration its strategic location within a major sewershed. The environmental considerations include, but are not limited to:

- the site's location in a FEMA Flood Zone A,
- the history of the site as a wetland and the stated need for wetland reconstruction by the US Army Corps of Engineers,
- the on-going Superfund cleanup process,
- the soil remediation required on the site,
- the impact of the development on the overall watershed drainage patterns in the area, and
- the impact of development on Third Street, the official Coastal Evacuation route for the Red Hook and Carroll Gardens neighborhoods.

4.1 WETLANDS & FLOODING

Anyone who knows the Gowanus area understands the significance of a rainy day (see APPENDIX C, Img. 2 and 3). Combined Sewer Outflows (CSO), triggered by as little as one-tenth an inch of rainfall, results in untreated sewage flowing into the canal at 14 different points.

As a flood zone, the waterfront properties are frequently flooded. Furthermore, the WFM site is a low point within the Gowanus sewershed (see APPENDIX E, Environmental Mapping of Gowanus Canal). During storms, storm water runoff rushes down Third Street towards the Canal. The rising water level of the canal during wet weather events also causes groundwater to rise, making the site particularly flood-prone. The plan also will increase the amount of impervious surface in the area. To clarify a potentially misleading aspect of WFM's proposal, the design includes a green house on the roof, not a green roof, and will exacerbate, not mitigate the storm water management concerns.

Finally, the WFM proposal does not recognize that the site is located in a former wetland area, and does not include wetland restoration at the site, as suggested in the U.S. Army Corps of Engineer's Hudson-Raritan Estuary Ecosystem Restoration Study. In fact, this past spring, wetland plants flowered on the site where water accumulation occurred. The proposed protective structures that restore the bulkhead and re-grade the site ignore regional flooding concerns. This confluence of factors points to increased flooding in the Gowanus area due to the WFM development that will negatively impact nearby businesses, property owners and residents.



Projections of sea level rise based on a suite of climate change scenarios suggest that sea levels will rise by 18-60 cm by the 2050s, and 24-108 cm by the 2080s over late 20th century levels. A December 2010 report by the New York State Sea Level Task Force calls for reducing the extent of development of new facilities in high risk waterfront areas, achievable only through all levels of government decision-making. Questions remain as to whether WFM's storm water management plan is sufficient to handle these dual sources of water, and whether the existing 9' high bulkheads are sufficient given the 100-year flood height is at 9.7' and rising.

4.2 GOWANUS CANAL EPA SUPERFUND SITE

WFM ascertains that their project will not engage or disrupt the Superfund cleanup process. At a minimum, the soil dredging will release noxious odors that will make for an unpleasant shopping experience. During the dredging process, a staging area must be set up for the soil to dry, and several of the proposed sites are nearby. Furthermore, recent discussions between the EPA and the CAG have talked about the possibility of installing an underwater holding tank beneath the 4th Avenue Basin for combined sewer overflow. Such a facility would undoubtedly cause additional negative externalities.

Meanwhile, the EPA and the Gowanus Community Advisory Group (CAG), comprised of representatives of 30 community organizations and an additional 20 individuals, all considered Gowanus stakeholders, are in the process of determining the scope of the Superfund cleanup with the EPA. At its December 5, 2011 general meeting, the CAG passed a resolution requesting that "BSA postpone its decision to grant a variance for Whole Foods until the EPA release its work plan and Record of Decision for the cleanup" (see APPENDIX F).

A second motion was passed requesting WFM to appear at a CAG meeting to discuss their bulkhead and general site plan to ensure compatibility with the Superfund effort.

These motions reflect anxiety in the community about the project by those intimately knowledgeable about the Superfund program, given WFM's lack of public outreach.

A coordinated response to the canal and uplands cleanup is in the best interest for all parties. A BSA approval of WFM's application would likely adversely impact the \$500 million cleanup if done before the EPA's final cleanup plan.



Further, there have been recent EPA and CAG discussions about a where a staging area the cleanup effort could be sited, for example, where dredged materials could be dried, exposing noxious odors. Several sites have been identified, and the WFM site is considered an ideal one given the two sides of waterfront access, one off the main canal course.

The EPA has also suggested the installation of a holding tank underneath the 4th Street Basin as a CSO mitigation strategy, directly adjacent to the Whole Foods site. Years of construction are required for such an undertaking, along with the presumed on-going venting and maintenance.

How would such an effort intersect with development activity at the WFM Site? Again, how would a retail food use respond to such activities and what are the implications for the cleanup process?

5.0 ALTERNATIVES & RECOMMENDATIONS

The Gowanus Institute believes that by presenting alternative real estate, planning and urban design scenarios, it can be a conduit of ideas and solutions that can help chart a balanced, desirable course of action for the Canal and its neighbors.

5.1 ALTERNATIVES FOR THE SITE

This section explores options for how the site can be developed as-of-right in an M-2 zone. The following section explores three other as-of-right development options for the site that would not require a variance, and would contribute to the economic, social and environmental health of the community. Currently, industrial vacancy rates are at 3%, lower than the citywide commercial vacancy rates, which are between 8-9%.

5.1.1 ALTERNATIVE 1: As-of-right Multi-Tenant Manufacturing Development

While WFM' Economic Assessment Report includes a warehouse as a comparable for an as-of-right use, it does not explore an operational manufacturing use. Although there has been little new industrial construction in New York in recent years, the feasibility for such development is positive, particularly given an increasingly supportive



policy environment for certain manufacturing sectors, such as green technology, small industrial incubator space and food manufacturing. The Brooklyn Navy Yard, for example, is "in the midst of its largest expansion since World War II" and is planning an eight-building expansion including over 1.7 million square feet of new industrial space.

A CREATIVE INDUSTRIES DEVELOPMENT ACROSS FROM WFM SITE

5.1.2 ALTERNATIVE 2: As-of-right Maritime Manufacturing Use

Four years after the city allowed IKEA to turn a historic dry dock in Red Hook into a parking lot, a city-commissioned study found that the city needs at least seven new docks just like the one it gave up. John McGettrick, co-chair of the Red Hook Civic Alliance, called the deal to allow IKEA to build a parking lot where the dry dock sat a "billion-dollar boondoggle." It would be a shame to see a similar blunder made on the Gowanus

Canal by taking away a piece of its working waterfront. Barging activity on the Gowanus Canal, below Third



Avenue, continues, by companies such as such as Benson Scrap Metal and Dorann Resources. Scrap metal is hauled off, and trash is piled on to barges. Other businesses that could use barges as a primary mode of material transport should be attracted to properties along the canal.

BARGING ACTIVITY ON THE FOURTH ST BASIN BEHIND THE WFM SITE

5.1.3 ALTERNATIVE 3: As-of-Right Soil Remediation Center

While ecology and industry are often seen as a necessary tradeoff, a soil recycling facility offers the Gowanus an opportunity to create new industry, while addressing a pressing problem on the Canal—an environmentally-responsible approach to brownfield cleanup that would keep jobs local. Numerous design and planning proposals for the Canal suggest such a direction. Columbia University’s “Eco-Gowanus: Urban Remediation by Design” explores the “economics of remediation,” suggesting strategies that allow for in-situ cleanup for soil layered with other uses, such as public access. With the dredging of the Canal on the horizon, and a landscape of brownfields



throughout the area, such a solution is a compelling vision. Early discussions between a major New York City developer and McEnroe Farms in the Hudson Valley, the operator of the largest composting facility in New York State’s largest organic farm, have begun talks about implementing such a development on the canal.

COMPOSTING AND SOIL MANUFACTURING AT MCENROE FARMS, UPSTATE NY

5.2 ALTERNATIVES FOR WHOLE FOODS

GI believes that WFM is missing an opportunity to serve more Brooklynites by pursuing its current course of development. GI believes, there are ways for the company to succeed in Brooklyn by better addressing local realities and consumer behavior. Below are recommendations for three alternate approaches.

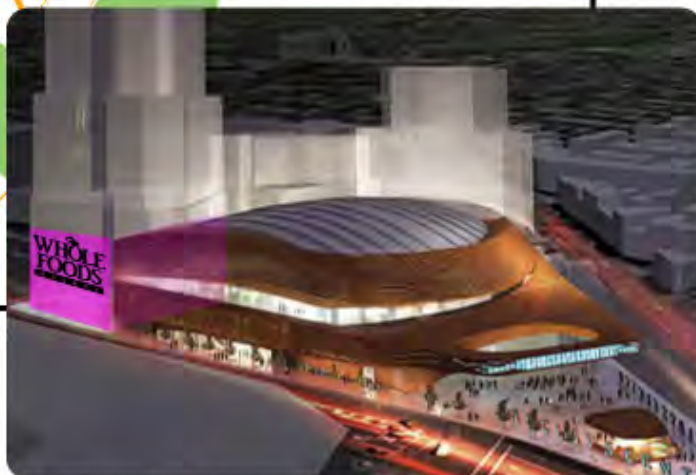
The current plan:

- Has a regional-scale footprint, but is not situated in a regionally-accessible location (it is more than one mile from entrance ramps to the BQE and there is no subway within a 10 minute walk)
- Is not compliant with current zoning, as it is located in an M2-1 zone within an IBZ
- Is out of character with the industrial neighborhood



5.2.1 ALTERNATIVE I: Situate the store within a mixed-use, transit-friendly, urban-style development

- Show a commitment to a sustainable development approach, through transit-oriented, dense urban development. WFM currently operates seven urban-style stores in Manhattan. A similar approach in Brooklyn could work as well.
- Locate within a high-rise residential project currently in development on Fourth Avenue, a six-lane commuter route running from the very south to central Brooklyn, with R/N subway line directly below.
- Locate within the new Atlantic Yards development currently in the planning stages.

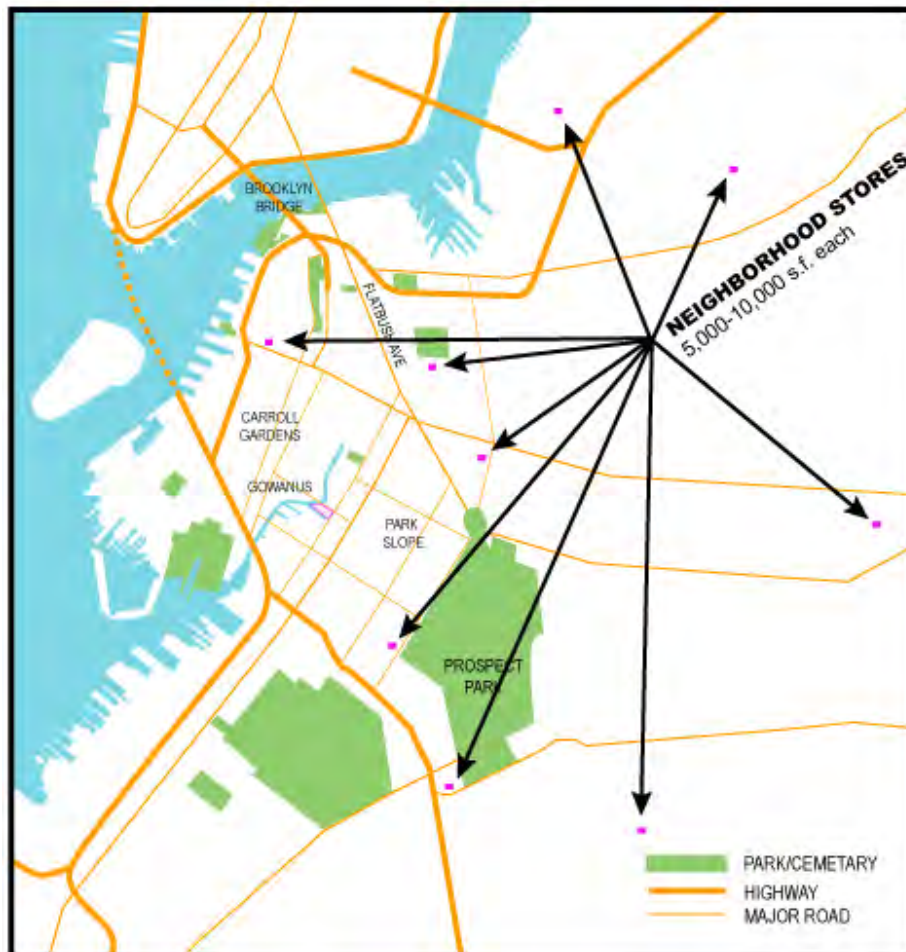


Whole Foods at Barclays Stadium at Atlantic Yards (Modified rendering, ShoP Architects)

5.2.2 ALTERNATIVE 2: Create smaller, neighborhood-scale stores throughout Brooklyn

Building several, smaller neighborhood-based stores rather than one regional store is a good idea because:

- Stores would fit within existing neighborhood fabric and commercial overlay zones
- Allows for a pedestrian-oriented shopping experience, rather than a suburban one
- Other retail chains, such as Walmart, are currently investigating such strategies for urban neighborhoods, and are finding success.
- Manhattan, with an area of 24 sq miles and 1.7 million people, has seven stores. Brooklyn, with 75 sq miles and 2.5 million people, assuming comparable demographics, could have 12 neighborhood stores.



5.2.3 ALTERNATIVE 3: Build a regional store in a truly regional location

Locating the store in a truly regional location on large parcels means:

- Easy access from major regional thoroughfares, such as the BQE, Belt Parkway, Prospect Expwy.
- Less congestion on local roads
- Easier and less costly development process.

See APPENDIX G for an appropriate site currently available, with TERRA CRG listings, as follows:

- 1728 Shore Parkway, Brooklyn





6.0 WORKS CITED

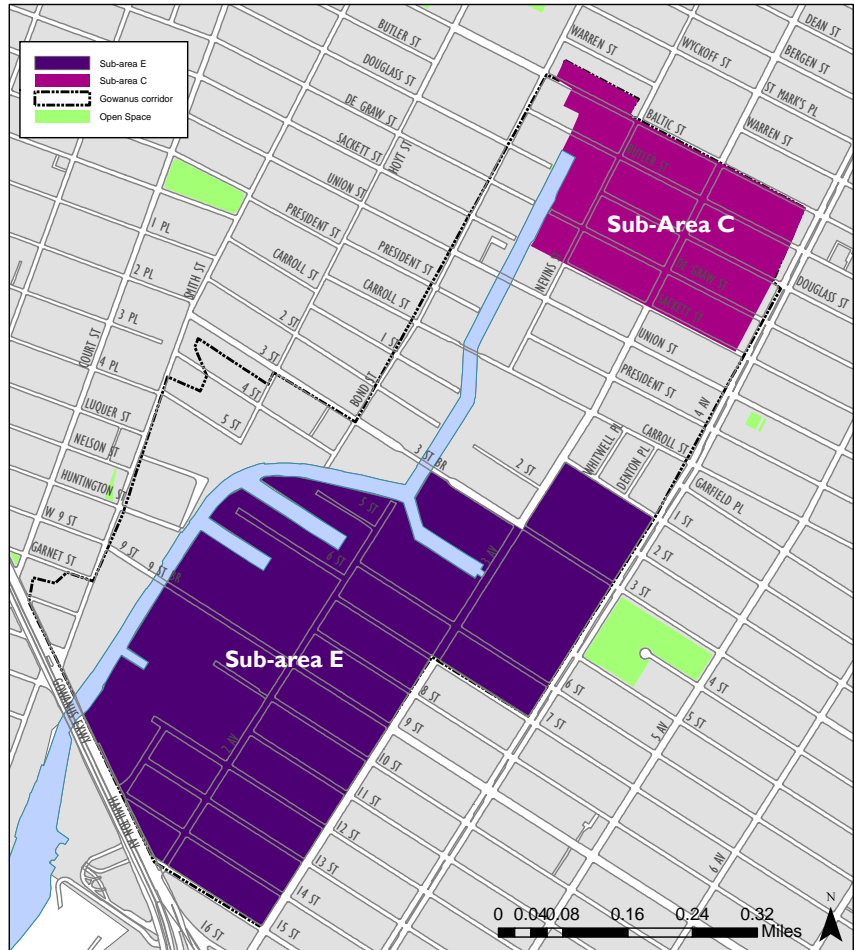
- New York City Department of City Planning "Gowanus Canal Corridor Rezoning Study₁"; May 2008, accessible at <http://www.nyc.gov/html/dcp/html/gowanus/gowanus4.shtml>
- New York City Department of City Planning, "Gowanus Canal Corridor Rezoning Study." Presentation, May 2008.
- MAS "Statement from the Municipal Art Society of New York Regarding Gowanus Zoning and Related Actions₁"; March 11, 2009
- FROGG, "The Community Hopes You'll Consider the FACTS when voting on WHOLE FOODS' request for a variance" (presented at Community Board 6 General Meeting, June 6 2011)
- Nyman, Jack, et al., "Reconsidering Gowanus₂". The Newman Real Estate Institute, New York, 2010.
- Ferrandino & Associates, et al, "Gowanus Canal Comprehensive Community Plan₁"; Gowanus Canal Community Development Corporation. (Dec 2006)
- 75-02-BZ Resolution for 460 Union Street "Application March 12, 2002 -0 under Z.R. §72-21 to permit the proposed construction of a six story, 64-unit residential building, Use Group 2, location in an M2-1 zoning district, is contrary to §42-00"; and 241-02-BZ Resolution for 130 Union Street "Application August 30,2002 – under Z.R. §72-21 to permit the proposed conversion to residential use, of two connected vacant manufacturing building, Use Group 2, located in an M2-1 zoning district, that will provide 48-residential loft type units, and is contrary to §42-00."
- Question 10e on CEQR form: "*Would the proposed project involve development on a site one acre or larger where the amount of impervious surface would increase and is located within the Jamaica Bay Watershed or in certain specific drainage areas include: Bronx River, Coney Island Creek, Flushing Bay and Creek, Gowanus Canal, Hutchinson River, Newton Creek or Westchester Creek?*"
- NYU's online database only dates back to 1992.
- "Mayor Bloomberg and Speaker Quinn Announce 22 New Initiatives to Help Small Industrial Businesses Stay and Grow In New York City," City of New York, Press Release, June 7, 2011.
- CNN.com "100 Best Companies to Work For, 2006" <http://money.cnn.com/magazines/fortune/bestcompanies/snapshots/1575.html>
- Pratt Center for Community Development, "Protecting New York's Industrial Space," August 2008.
- Gornitz, V., S. Couch, and E.K. Hartig, 2001: Impacts of sea level rise in the NYC metropolitan area. *Global Planet. Change*, 32, 61-88.
- Brooklyn Navy Yard, "Development₁"; www.brooklynnavyyard.org, accessed 11/10/11.
- Calder, Rich, "Ikea Birth Pangs: City Dock Deal A \$1 Billion Blunder₁"; New York Post, 6/23/08.
- Plunz, Richard, Patricia Culligan, eds. "Eco-Gowanus: RUabn Remediation by Design" MSAUD/New Urbanisms 8, GSAPP, Columbia University, 2007.
- Kellermann, Josh and Stephanie Luce, "The Walmartization of New York City₂"; ALIGN and The Murphy Institute, SUNY, August, 2011.
- Fuhrman, Heather. "Remediation Infrastructure: A Comprehensive Development Strategy for the Remediation of the Gowanus Canal." Masters Thesis, Landscape Architecture, City College of New York, New York, 2009.



WHOLE FOODS BROOKLYN
BSA APPLICATION # BZ-11-66
PUBLIC HEARING TESTIMONY
13 DEC 2011 (REV 1.0) | PAGE 40 OF 66

APPENDIX A: BROWNFIELD OPPORTUNITY AREA (BOA) REQUEST FOR PROPOSAL

Gowanus Canal Corridor Brownfield Area of Opportunity Request for Proposals for Planning and Economic Analysis Services



**Gowanus Canal Corridor Brownfield Opportunity Area
Request for Proposals for Planning, Design and Economic Analysis Services**

Overview

The Friends of Brooklyn Community Board 6, Inc, is the recipient of a Brownfield Opportunity Area grant by the state of New York. The fund will aid in the redevelopment of specific areas surrounding the Gowanus Canal. Friends of Brooklyn Community Board 6, Inc will serve as the lead partner for the Gowanus Canal Corridor Brownfield Opportunity Area (BOA) Nomination Study, which will include managing consultants and providing financial oversight of the grant.

The Brownfield Opportunity Area Grant supports a community based planning process that seeks to re-use and redevelop properties along the Gowanus Canal for industrial use, economic development and/or environmental educational purposes. It is the goal of the Friends of Brooklyn Community Board 6, Inc that this process will influence the economic and industrial growth and environmental remediation of the Gowanus Canal Corridor for years to come.

Friends of Brooklyn Community Board 6, Inc. have developed a set of priorities for appropriate redevelopment of the Gowanus Canal Corridor which includes the following:

- Industrial and Commercial retention of the Gowanus Canal Corridor;
- Attracting industries that manufacture building materials for construction;
- Expanding Green Technology design and manufacturing sector including green roof, energy retrofits, and production of solar components;
- Developing areas for business incubator spaces that will in turn encourage a cluster of green industries;
- Adaptive re-use of existing building stock;
- Promulgating environmental education, open space and waterfront access opportunities.

Friends of Brooklyn Community Board 6, Inc seek an innovative and progressive consulting team that will acknowledge that canal's significance in a broader local and regional context. The consultant team will be required to work in partnership with community groups and government agencies (communities, businesses, City, State and Federal agencies) to create an appropriate plan for contextual redevelopment and re-use of existing buildings along the canal corridor. It is strongly encouraged, that responses include creative planning practices that acknowledge the challenges associated with industrial and mixed-use areas. In addition, respondents should identify recent existing studies and analysis of the Gowanus area that might be useful to inform the Nomination Report and serve as a platform from which to build new ideas and opportunities. Direct experience working with the NYS BOA program is strongly preferred.

Purpose

The respondents to this RFP will prepare a Brownfield Area Nomination that is in accordance with all BOA program requirements. Including an analysis of the existing conditions, assets, opportunities, and barriers related to the Study Area. This document will serve as the framework for guiding the preparation process for responding to this RFP. It is therefore urged that respondents closely

examine the major goals for the BOA project.

Gowanus Canal Corridor BOA Boundaries

The Gowanus Canal Corridor BOA boundaries consist of two sections: subsection C and enhanced subsection E. Subsection C is composed of a 12 block area that is bounded to the north by Baltic Street, the south by Sackett Street, the east by 4th Avenue, and the west by the Gowanus Canal (see **Map 1**). This section is characterized by industrial uses - zoning in the southwest area is M1-2 and the remaining lots are in the M2-1 zone (see **Map 2 and Map 3**). The second area, enhanced subsection E, is much larger and consists of 21 blocks bounded on the NE corner by 1st Street, to the south by 15th Street, the SW corner Hamilton Avenue and the canal (see **Map 1**). This section is composed of mainly industrial buildings, several commercial and office buildings, and parking facilities.

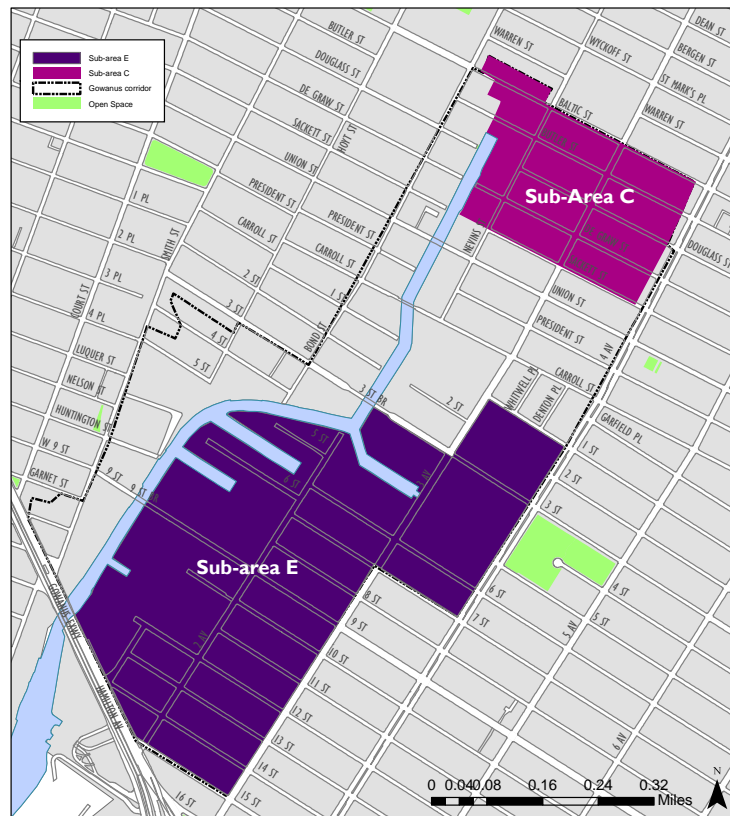
Study Area Background

The Gowanus Canal Corridor has a rich history of industrialization along the canal's banks. The total area of the corridor equals 204 acres. It is located in Community District 6, in the Gowanus neighborhood and in close proximity to Boerum Hill (north), Carroll Gardens (west), Cobble Hill (west), Red Hook (south and west) and Park Slope (east) neighborhoods.

Topographically, the canal sits in a low laying area surrounded by Carroll Gardens/Cobble Hill to the west and Park Slope to the east; these neighborhoods sit on higher topographic land. Therefore, the Gowanus Canal serves as a natural drainage area for these neighborhoods and has partially contributed to the contamination of the canal as stormwater runoff becomes Combined Sewer Overflows (CSO) which continues to infiltrate the canal. The other sources of contamination include toxic sediment at the bottom of the canal, and legacy contaminants in some upland properties of industrial businesses that have been operating along the canal for over a century.

Map 1:

Project Boundaries Gowanus Canal Corridor BOA: Sub-area C and Enhanced Sub-Area E



Sources: NYC DCP Pluto 2010, DoITT Open Space 2007, DCP LION 2010, Gowanus Canal Corridor BOA 2010
Friends of Brooklyn CB6, Inc. | 250 Baltic St, Brooklyn, NY 11201-6401 | 718.643.4752 | www.fbc6.org

History

Originally inhabited by Native American tribes, the area was sold to Dutch settlers who dredged areas of the creek and set up tidal mills and farms. It was not until the mid 19th Century that the Gowanus Canal was constructed in accordance with Daniel Richards' Plan for Brooklyn. Soon after industrial development flourished due to the facilitation the canal provided for water transport of industrial materials and the close proximity of the Atlantic Basin in Red Hook. Many of the industries manufactured building materials for the brownstones built in Park Slope and were integral to the proliferation of 'Brownstone Brooklyn.' There were also oil refineries, cement manufacturers, coal yards and paint and ink factories located along the canal.

It was thought that the natural tide would facilitate drainage of toxic materials into the Buttermilk Channel, however the canal lay stagnate as more and more toxic materials were dumped in the waters. In 1911, an underground tunnel equipped with a propeller was constructed to help flush the canal of toxic materials. The pump broke in the 1960s and was not fixed until 1999 by the Department of Environmental Protection (DEP).

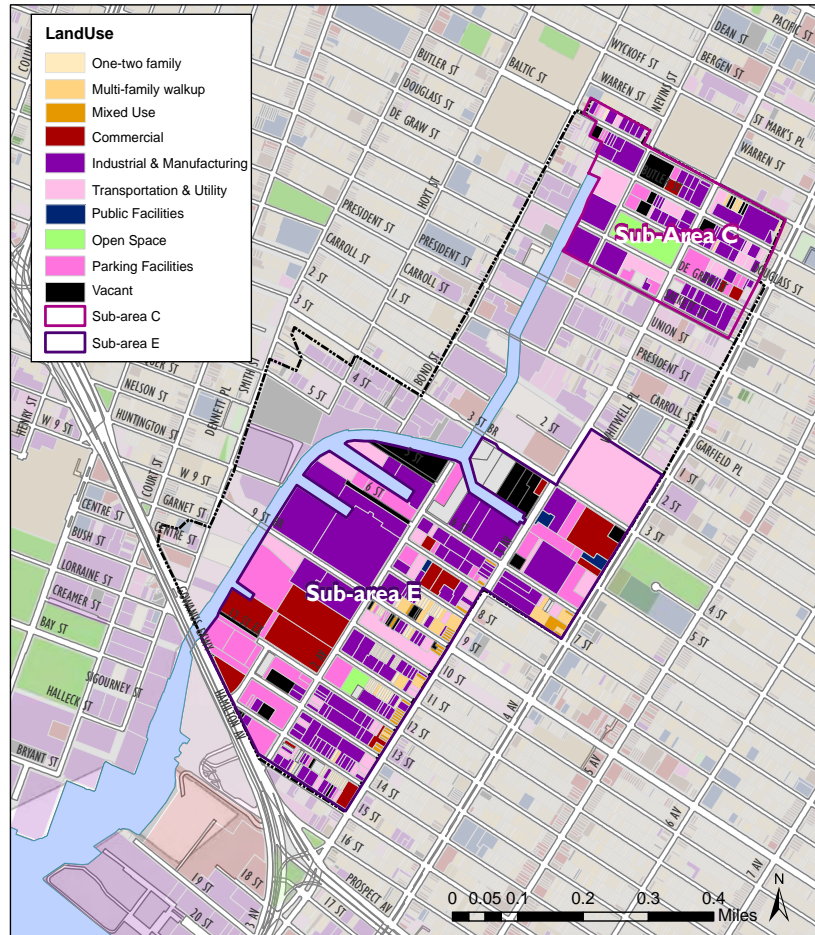
By the 1950s, major highway construction including the Brooklyn-Queens Expressway and the Gowanus Expressway encouraged freight transportation of goods rather than barge or water transport. By the 1970s, the area began to decline as industrial businesses left the area. This in turn led to a job loss and subsequent population decrease. However, within the past 20 years the area has shown signs of revitalization as the neighborhoods of Carroll Gardens and Park Slope have been growing. Most recently the Gowanus Canal has been designated a Superfund site by the Environmental Protection Agency in March 2010.

Current Land Use and Zoning

The project area (subsection C and enhanced subsection E) consists of 126 acres and 482 tax parcels. The predominant land use is industrial and manufacturing which accounts for 41.6 percent of the total acreage. Following industrial uses, the second predominant land use is parking facilities equaling 16.6 percent and transportation and utility equaling 12.6 percent of the total acreage (see **Map 2 and Figure 1**). Residential land uses (one- to two-family and multi-family walk-up combined) account for a small percentage (3.6 percent) of the total acreage of the project area. The area is characterized as mostly low scale industrial buildings averaging one to two stories in height with a few multi-story buildings interspersed throughout both sections. The predominant zone for the combined subsections is industrial, which consists of M2-1 (335 lots) and M1-2 (104 lots) (see **Map 3**).

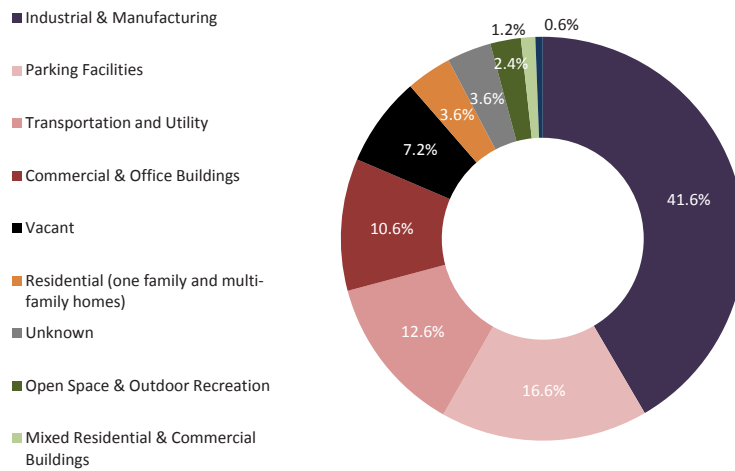
Map 2:

Project Boundaries Gowanus Canal Corridor BOA: Land Use



Sources: NYC DCP Pluto 2010, DoITT Open Space 2007, DCP LION 2010, Gowanus Canal Corridor BOA 2010
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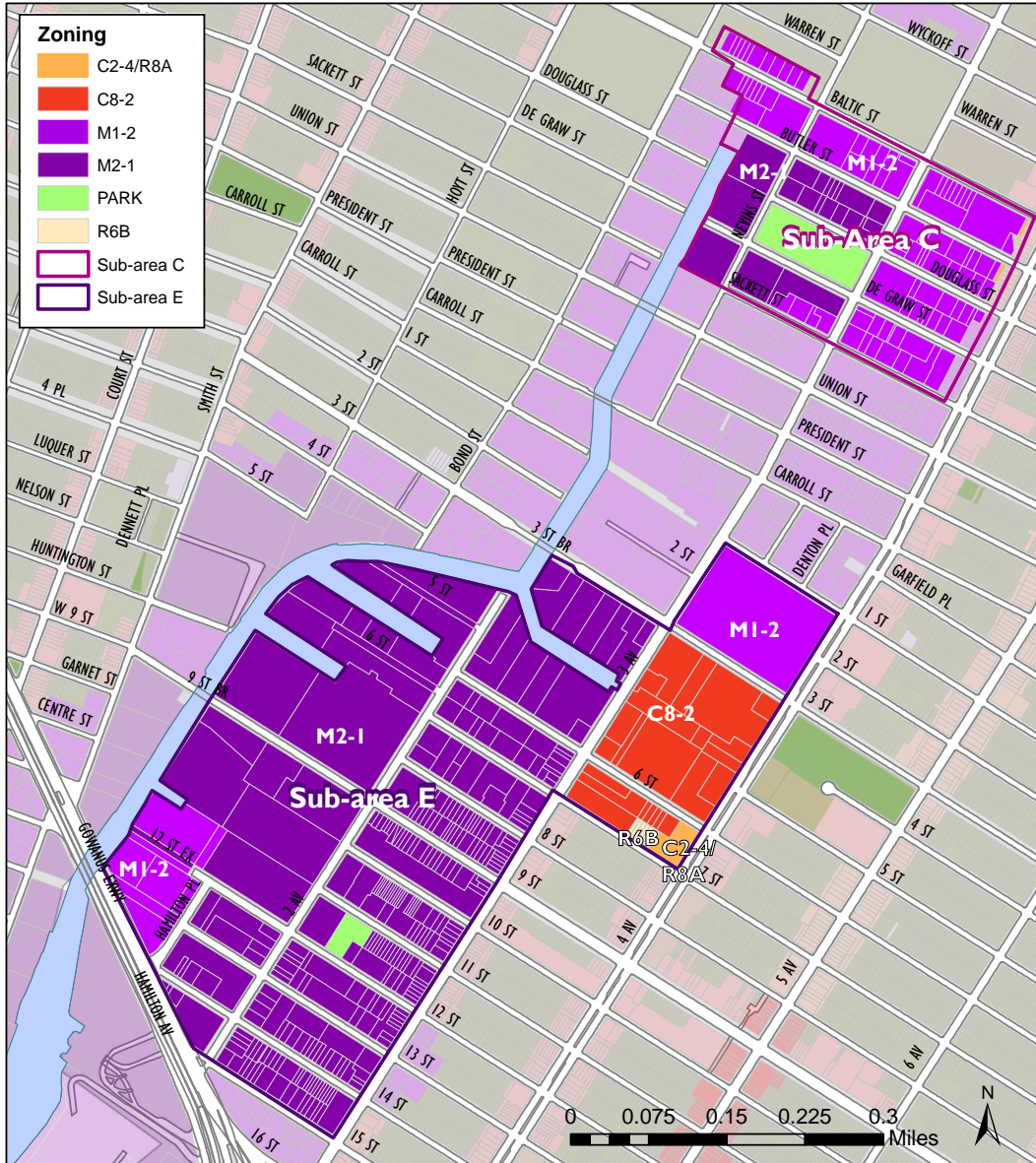
Figure 1: Land Use by percentage of total acreage.



Source: NYC DCP Pluto 2010.

Map 3:

Gowanus Canal Corridor BOA: Zoning



Sources: NYC DCP Pluto 2010, DoITT Open Space 2007, DCP LION 2010, Gowanus Canal Corridor BOA 2010
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Scope of Work

Project Initiation and Organization Meeting

The project will start with a meeting of the selected consultant, Friends of Brooklyn Community Board 6, Inc., Department of Environmental Conservation (DEC) and the New York State Department of the State to discuss the scope of work. The purpose of the meeting is to discuss the details of the work including project scope, study area boundary, SEQRA requirements, community participation, project goals and objectives, existing information about the site, time line (deadlines), and expected deliverables.

Stakeholder Meetings, Presentations and Interaction

The consultant team that is awarded this RFP will be required to hold at least three meetings with the community and stakeholders in order to insure that the local community's values are an inclusive portion of the planning process. Participants will include CBOs, community residents and businesses, governmental agencies and elected officials. The consultants along with Friends of Brooklyn Community Board 6, Inc. will coordinate these meetings. It is anticipated that there will be an initial meeting to introduce the project, a mid-point meeting to provide updates of the project, and a closing meeting at the end which will summarize findings and recommendations for the BOA sites.

Analysis of Community and Regional Setting

The Steering Committee has expertise in demographic analysis and plans to use these resources to aid in the completion of Community and Regional Setting analysis. This analysis will examine the local demographic patterns of the community in the Gowanus neighborhood through a collaborative effort of the consultant team and Friends of Brooklyn Community Board 6, Inc. This report will include the following:

- Population size of the community in comparison to the local and regional area.
- Housing trends and needs of the community in comparison to the local and regional area.
- Past and current economic trends of the community including income, employment, and unemployment figures in comparison to the local and regional area.

Deliverables: A written analysis of the community and regional setting equipped with maps and charts demonstrating demographic trends of the community.

Inventory and Analysis of Existing Conditions

Currently, the Steering Committee has expertise in community development, land use analysis and GIS mapping and plans to leverage these skills for this component of the Nomination Work Plan. The committee, therefore, seeks an active collaboration with the selected consultant to complete the Inventory and Analysis of Existing Conditions portion of the project. Nevertheless,

it is strongly urged that respondents are already aware of the key issues and existing conditions that currently affect Gowanus Canal Corridor.

This will include the following objectives:

- Location of the study area and its relationship with the surrounding areas
- Acreage of each type of land use including residential, commercial, mixed use, industrial, public facilities, transportation and utility, parks and outdoor recreation, public versus private space for the BOA
- Overview of the current industrial activity in the Gowanus Canal Corridor
- Existing zoning for the subsections of the BOA
- A land use analysis identifying underutilized sites within the subsections of the BOA
- Analysis of potential uses of identified underutilized sites
- Location of Brownfield sites and all underused, abandoned or vacant properties that are publicly or privately owned within the subsections of the BOA.
- Identification of transportation systems surrounding the area including major roads, highways, and public transportation (subways and bus routes and stops)
- Environmental conditions of sites within the subsections
- Identification of key infrastructure and utilities located in and near the BOA
- Identification of Natural Resources and Environmental features located in the BOA
- Identification of significant historic or archaeological areas located within or near the BOA
- Known data about the environmental conditions of the properties in the area
- Local, county, state or federal economic development designations or zones (such as Empire Zones, Environmental Zones, Urban Renewal Areas, Federal Enterprise Business Zones, Business Improvement Districts, Special Assessment Districts, etc)

Deliverables: An existing conditions report and presentation cataloguing land use, zoning, natural resources, historic sites and identification of areas of opportunity.

Maps: Existing Land Use, Existing Zoning, Underutilized Sites Location, Land Ownership Map, Parks and Open Space, Building Inventory, Historic or Archeologically Significant Areas, Transportation Systems, Infrastructure and Utilities, and Natural Resources and Environmental Features.

Economic Analysis

The central value of the economic analysis is to analyze the following potential goals for the Gowanus Canal Corridor:

- Attracting industries that manufacture building materials for construction
- Expanding Green Technology design and manufacturing sector including green roof, energy retrofits, and production of solar components
- Developing areas for business incubator spaces that will in turn encourage a cluster of green industries

Keeping these goals in mind, the respondents should put forth an approach to sectorial analysis of the potential for green industries in this area. The analysis should include economic and environmental benefits, and the viability of green businesses and manufacturing for the Gowanus Canal Corridor.

Urban Design Analysis

In addition to the economic analysis, the consultant team should demonstrate creative and innovative urban design elements for the subsections of the Gowanus Canal Corridor BOA. This could include but is not limited to an emphasis on green infrastructure, streetscape improvements, lighting, improved access to the canal, and landscaping to create a cohesive yet dynamic environment for the proposed areas within the BOA. It is recommended that the consultant team be sensitive to the industrial and historic character of the area and institute guidelines that will help preserve the local character.

Identification of Issues and Opportunities and Draft Recommendations

The consultant team will develop an analysis of issues and opportunities for key strategic sites within the BOA area boundaries, with the aid of Friends of Brooklyn Community Board 6, Inc, the Steering Committee, and other consultants. This report will also include recommendations for the best use of these strategic sites including infrastructural and adaptive re-use improvements. It is hoped that this process will develop a working relationship between the Steering Committee and the consultant that could ultimately influence future work in the Gowanus area.

Deliverables:

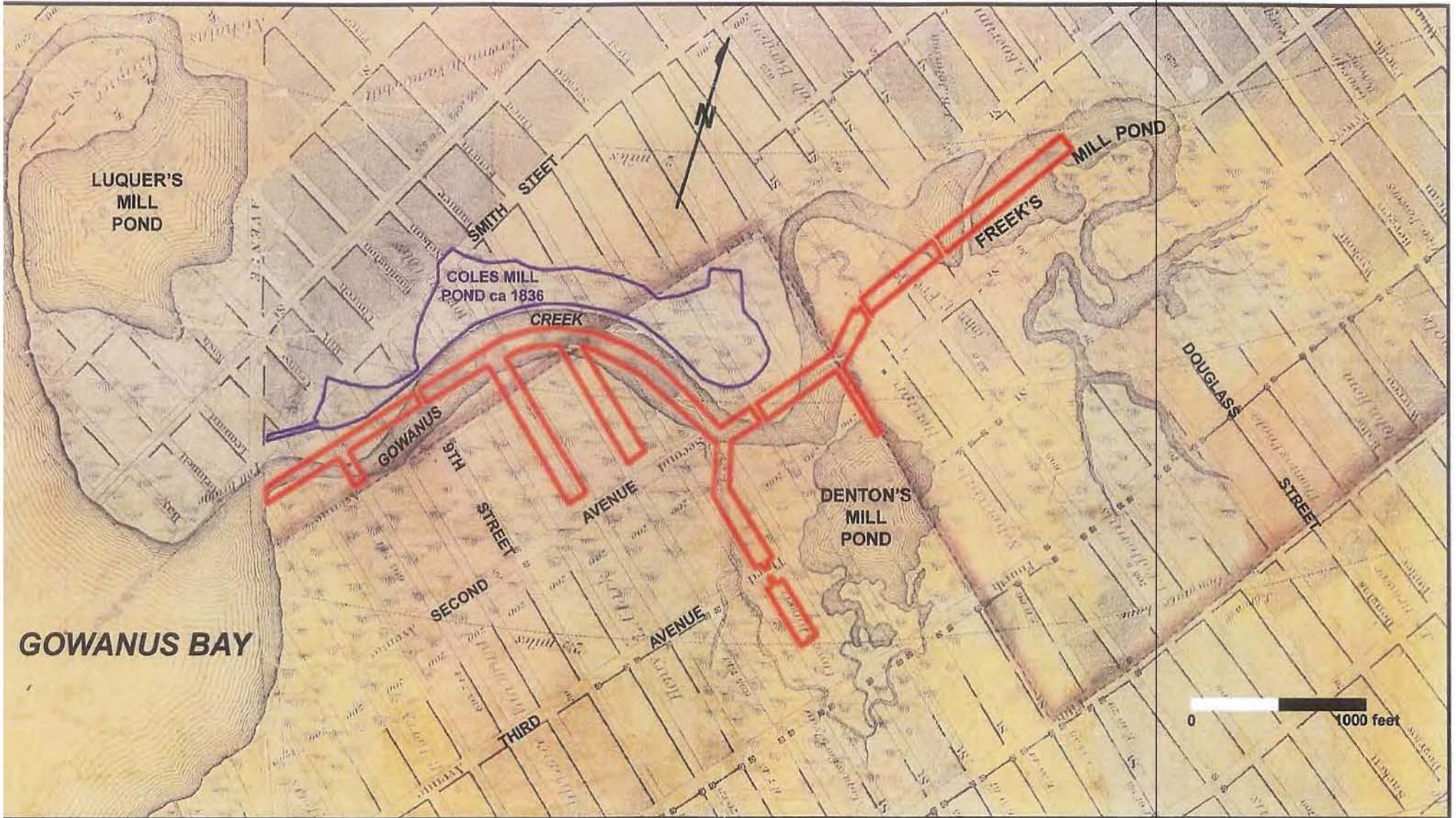
Report identifying issues and opportunities for the Gowanus Corridor BOA sections. More specifically, recommendations for uses and improvements for strategic sites. This report will include graphic documentation supporting the recommendations: maps, charts, tables, and exhibits.



APPENDIX B: MARSH AND FLOOD MAPS

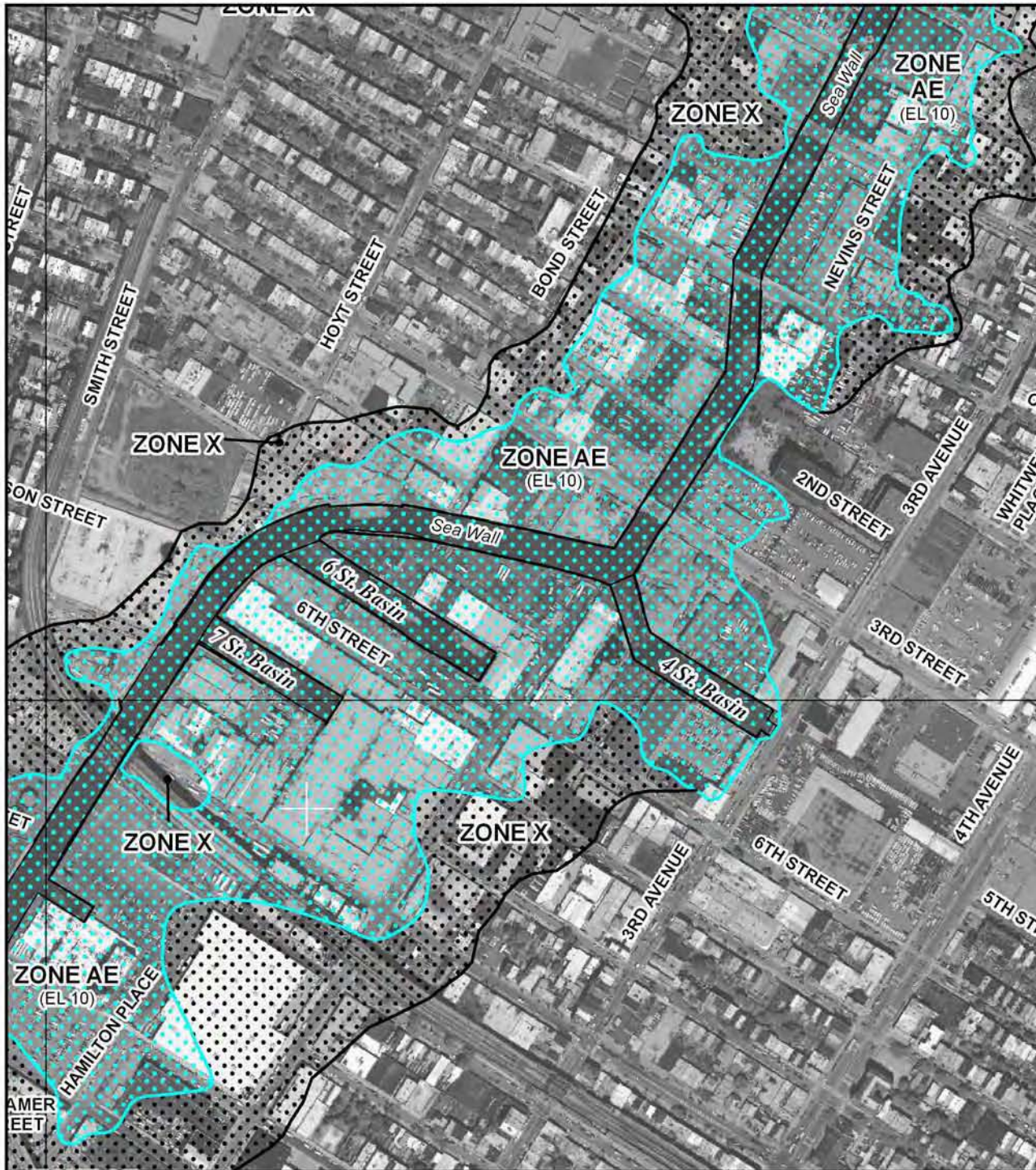
Map 1: Historic Map of Creek and Marshland with Canal overlay

Map 2: FEMA Flood Map



This map shows the original creek, marsh, and mill ponds of the Gowanus Canal. The base map was likely prepared c.1839, prior to completion of the first Hamilton Avenue bridge over Gowanus Creek. The disappearance of Coles Mill Pond from the landscape between c.1836 and 1839 suggests the ephemeral nature of ponds created in salt marsh environments. This map is especially useful for understanding the engineering design of the canal route, as the detailed street grid plan (a close semblance of what exists today) was not actually implemented until after the canal was constructed.

US Army Corps of Engineers, National Register of Historic Places Eligibility Evaluation and Cultural Resources Assessment for the Gowanus Canal
Base map: Colton 1849; Coles Mill Pond outline from Bleeker 1836; canal outline in red from U.S. Army Corps of Engineers 1942



NFP
NATIONAL FLOOD INSURANCE PROGRAM

PANEL 0211F

FIRM
FLOOD INSURANCE RATE MAP

CITY OF
NEW YORK,
NEW YORK
 BRONX, RICHMOND, NEW YORK,
 QUEENS, AND KINGS COUNTIES

PANEL 211 OF 457

(SEE MAP INDEX FOR FIRM PANEL LAYOUT)

CONTAINS:

COMMUNITY	NUMBER	PANEL	SUFFIX
NEW YORK, CITY OF	360497	0211	F

Notice to User: The Map Number shown below should be used when placing map orders; the Community Number shown above should be used on insurance applications for the subject community.



MAP NUMBER
3604970211F

MAP REVISED
SEPTEMBER 5, 2007

Federal Emergency Management Agency

This is an official copy of a portion of the above referenced flood map. It was extracted using F-MIT On-Line. This map does not reflect changes or amendments which may have been made subsequent to the date on the title block. For the latest product information about National Flood Insurance Program flood maps check the FEMA Flood Map Store at www.msc.fema.gov

APPENDIX C: PHOTOS



IMG 1. WFM Rep at CB6 hearing, describing plan on a 11x17 drawing

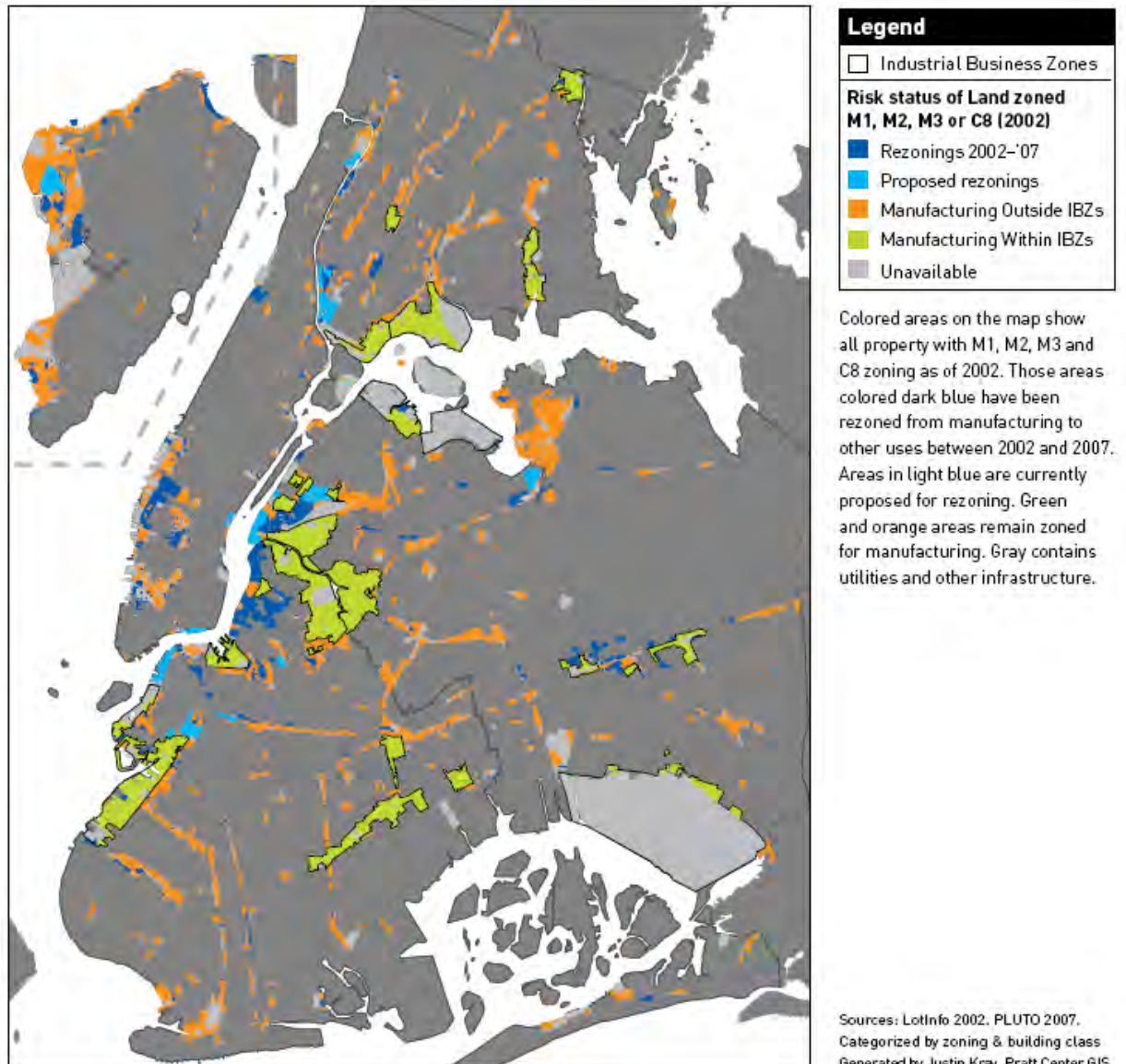


IMG 2. WFM site flooding after a typical rain storm (12/7/11)



IMG 3. Third Street Bridge after rain storm (www.pardonmeforasking.blogspot.com)

APPENDIX D: REDUCTION OF MANUFACTURING AREAS in NYC 2002-2007





APPENDIX E: ENVIRONMENTAL MAPPING OF THE GOWANUS CANAL

Fuhrman, Heather. "Remediation Infrastructure: A Comprehensive Development Strategy for the Remediation of the Gowanus Canal." Masters Thesis, Landscape Architecture, City College of New York, New York, 2009.

TOPOGRAPHY



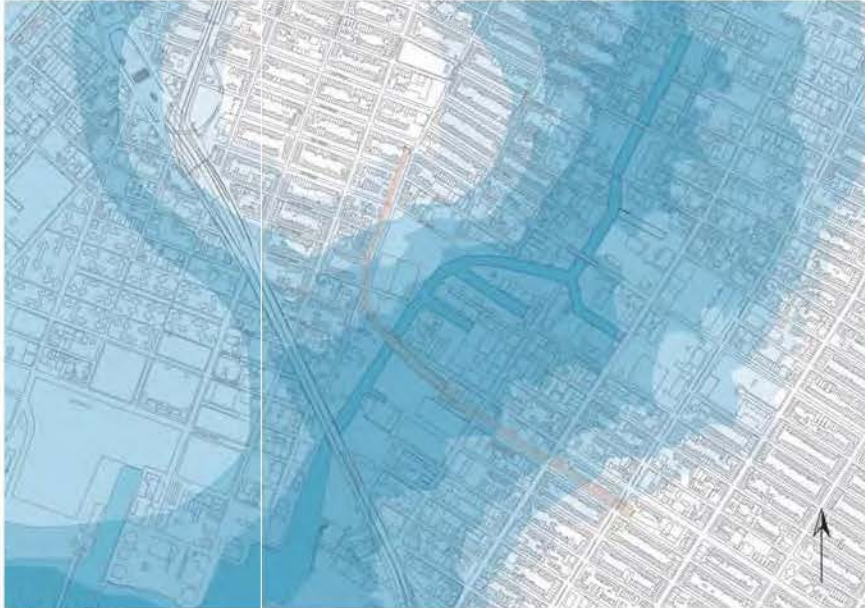
NOT TO SCALE

WATERSHED & HYDROLOGY



NOT TO SCALE

100 YEAR FLOOD & STORM SURGE



NOT TO SCALE

SYNTHESIS:

The topography of the site shows the surrounding area slopes toward the canal from both the east and west with the canal at the low point in the center. This ties directly into the hydrology of the site and watershed analysis. As shown in the watershed mapping, water collects from a large distance surrounding the canal. Additionally, the local watershed appears to have an increased surface flow due to the high amount of paved surfaces. The charting of the location of Combined Sewage Outfalls (CSO) and the possible networking of the systems begins to provide information about the sewage drainage area for this site. Adding to the problem is the combination of tidal flow and the Flushing Tunnel. These items in conjunction with the hydrology of the site creates a flood condition in turn increasing the CSO out put. The flooding is also of great concern in conjunction with possible contaminants on site and the movement of these pollutants through soil and water. Each of these creates environmental concerns that must be addressed.



WHOLE FOODS BROOKLYN
BSA APPLICATION # BZ-11-66
PUBLIC HEARING TESTIMONY
13 DEC 2011 (REV 1.0) | PAGE 60 OF 66

APPENDIX F: GOWANUS CANAL ADVISORY GROUP (CAG) RESOLUTIONS ON WFM

GOWANUS CANAL COMMUNITY ADVISORY GROUP

December 9, 2011

Hon. Meenakshi Srinivasan, Chair
New York City Board of Standards and Appeals
40 Rector Street, 9th Floor
New York, NY 10006

Re: Wachtel & Masyr LLP
172-220 Third Street, Brooklyn
Variance (§72-21) to permit a UG6 food store (*Whole Foods*), contrary to use regulations.
Calendar #: 66-11-BZ

Dear Chair Srinivasan:

The Gowanus Canal Community Advisory Group (CAG), at its December 5, 2011 general meeting, passed the following resolution directed to the NYC Board of Standards and Appeals:

The Gowanus Canal Community Advisory Group requests that the NYC Board of Standards and Appeals postpone its decision on Whole Foods Market's Variance Application until the US Environmental Protection Agency releases its Record of Decision for the Gowanus Canal cleanup plan.

In addition, for your information, the CAG passed the following resolution directed to Whole Foods Markets:

The Gowanus Canal Superfund Community Advisory Group requests that Whole Foods Market present to the CAG their general sitework and bulkhead plan for review and discussion.

The following describes the background discussion that took place at the Gowanus Canal CAG meeting on December 5, 2011 prior to the vote on the two resolutions above:

Whole Foods Market (WFM) is scheduled for a New York City Board of Standards and Appeals (BSA) public hearing on 12/13/11 to review its use variance application to construct a 78,000 GSF food market at the southwest corner of Third Street and Third Avenue, which is not permitted in M2-1 zone. WFM's proposed development is the largest new building development on the canal in generations, and is set on the single largest zoning lot along the Gowanus Canal, with 892 linear feet of canal frontage, the most frontage of any property along the canal.

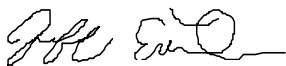
Members of the Gowanus Canal CAG want assurance that the WFM development is done in a manner that is compatible with the USEPA Superfund cleanup process, which is still in the planning phase. The CAG's understanding is that USEPA will be releasing its Feasibility Study by the end of 2011, announcing its selection of the clean-up remedy by June of 2012, and after a public comment period will be finalizing the selection of the clean-up remedy by the end of 2012 in a Record of Decision. Members of the Gowanus Canal CAG are concerned that the WFM development may adversely impact the EPA Superfund cleanup process, given the issues outlined below:

ISSUES & CONCERNS WITH WFM PROPOSED DEVELOPMENT

1. WFM's application does not thoroughly discuss its relationship to the EPA Superfund designation and cleanup plan, and makes a single reference to it saying "...our project proposes splash pads within the canal to handle stormwater runoff in compliance with and pursuant to NYSDEC's approval which will require notification of the EPA when installation is to happen. In addition, the EPA has two monitoring wells that may need to be preserved."
2. The CAG has requested technical assistance from the EPA regarding maintenance, repair and/or replacement of canal bulkheads which are historical, in poor condition and may further deteriorate with dredging;
3. WFM's development site includes three parcels with contaminated soil that are have not yet been remediated as well as four parcels with severely contaminated soil and underground storage tanks that have been remediated but that have not yet received final approval from NYSDEC;
4. WFM's development plan includes major sitework including: changes to grade and storm drainage as well as driving piles and other foundation work that could disturb contaminants below the level of remediated portions of the site and below the base of the bulkheads
5. WFM's development site was suggested as an ideal staging and production area for EPA Superfund cleanup-related activities;
6. EPA's cleanup process will include soil dredging that will omit noxious odors, be unsightly, and noisy, and incompatible with a food store;
7. A proposal to process the dredged sludge from the Gowanus Canal includes a suggestion by the US Army Corp of Engineers to vitrify and bury the sludge under the Fourth Avenue Basin which abuts the WFM site;
8. A proposal was made as part of the stormwater and CSO control plan for the area, to submerge a stormwater holding tank under the Fourth Basin which abuts the WFM site.
9. Failure to ensure compatibility between the WFM development and the USEPA cleanup process could prolong the impact of the clean-up on existing businesses and neighbors.

Sincerely,

Jeff Edelstein, P.E.



Gowanus Canal Community Advisory Group Facilitator

On behalf of the Gowanus Canal Community Advisory Group (see member list below)

Contact information: gowanuscagop@gmail.com, 207-632-8440

Organizational Members:

Brooklyn Chamber of Commerce

Carroll Gardens Coalition for Respectful Development (CORD)

Carroll Gardens Neighborhood Association

Center for Urban Pedagogy
Citizens of Pozzallo
Cobble Hill Association
Community Board 6
Fifth Avenue Committee
Friends and Residents of Greater Gowanus (FROGG)
Friends of Douglass/Greene Park, Inc.
Gowanus Canal Community Development Corporation
Gowanus Canal Conservancy
Gowanus Dredgers Canoe Club
Gowanus Houses Tenants Association
Gowanus Neighborhood Association/Gowanus-4-Life
Metropolitan Waterfront Association
Our Lady of Loretto Council #585, Knights of Columbus
Park Slope Civic Council
Park Slope Neighbors
Pratt Center for Community Development
Proteus Gowanus
Red Hook Civic Association
Red Hook East Tenants Association
Red Hook West Tenants Association
Riverkeeper
Sierra Club
South Brooklyn Local Development Corporation
Southwest Brooklyn Industrial Development Corporation
Urban Divers Estuary Conservancy
Wyckoff Gardens Tenants Association/Public Housing Communities, Inc.

At-large Members:

Brendan Aguayo
Jerry Armer
Sabine Aronowsky
Lucy DeCarlo
Anthony Deen
Eymund Diegel
Stefan Doering
Nathan Elbogen
Emily Guyer
Andrew Jackson
Katia Kelly
Linda LaViolette
Alex Lechich
Margaret Maugenest
Steven Miller



APPENDIX G: ALTERNATIVE WFM DEVELOPMENT SITES

1728 Shore Parkway, Brooklyn, NY 11214

Retail Development Site - Over 19 Acres of Upland & Riparian Rights

Available For Long Term Leasehold Interest



Property Information

Address: 1728 Shore Parkway
Neighborhood: Bensonhurst / Gravesend
Block: 6491
Lot: 190
Tax Lot Size (Apprx.): 350 ft x 1,590 Irreg.
Tax Lot SqFt (Apprx): 480,078 = 11 acres
Bulkhead to Pierhead SqFt (Apprx) 375,743 = 8.6 acres
TOTAL SqFt (Apprx) 855,821 = 19.6 acres

Building Class: K9 (Misc. Retail)
Zoning: M3-1
FAR: 2.00
Total Buildable Square Feet: 960,156

Assessment (11/12): \$ 531,000
Taxes (11/12): \$ 54,757

*All represented square footages are from the best available sources and must be independently verified.
Buildable square footages must be independently verified. Special treatment is given FAR when considering riparian rights.*

The subject property is available for long term NNN lease for the developable riparian rights or master lease for the entire lot including the uplands. The upland portion of the property is tenanted by a New York Sports Club, Stop&Stor storage facility and a hotel.

The property is located on Gravesend Bay in the Gravesend neighborhood of Southwest Brooklyn. It is immediately off the Belt Parkway adjacent to the Caesar's Bay Shopping Plaza whose tenants include Toys R' Us, Kohl's, and Best Buy.

Access to the water, the Belt Parkway and local roads allows for a variety of uses, including heavy industrial, ferry terminal, marina, and large format retail among others.

This is a unique opportunity to create a large mixed use development in one of the most accessible and dense areas of Brooklyn.

In place leases generate approximately \$550,000 in NOI with annual CPI adjustments.

All proposals will be considered.



For More
Information
Please Contact
Exclusive Agents:

Geoffrey T. Bailey
Vice President, Retail Services
gbailey@terracrg.com

(718) 395-1878

Call for more info

Terra CRG LLC | Licensed Real Estate Brokers | 592 Pacific Street, Suite B, Brooklyn, NY 11217 | P: 718-768-6888 | F: 718-768-6288

The information provided herein has either been given to us by the owner of the property or was obtained from sources we deem reliable. We do not guarantee the accuracy of any information. All zoning, existing square feet of buildings, available buildable square feet, permitted uses and any other information provided herein must be independently verified. The value of any real estate investment is dependent upon a variety of factors including income, vacancy rates, expense estimates, tax brackets and general market assumptions, all of which should be evaluated by



PROFILE

The **Gowanus Institute** is an independent think tank dedicated to realizing the most productive physical, cultural and economic development in the Gowanus neighborhood in Brooklyn that will enrich its working and living communities as well as the city with a balanced set of environmental & social profits, economic value and fiscal benefit.

The **Gowanus Institute** will:

- Conduct comprehensive **studies** and produce detailed **reports** on existing and proposed property developments and rezoning plans;
- **Develop** and propose alternate development and re-zoning **plans**, when necessary;
- Work with the local community and organizations to develop a cohesive **voice** to communicate its needs and desires for developing the neighborhood;
- Work with individual researchers, academic institutions, commercial and non-profit developers as well as city, state and federal agencies to **contribute** and **enhance** their studies, proposals and plans for the neighborhood;
- Develop, **present** and host public **programs** and events related to Gowanus neighborhood;
- Develop and **maintain** a physical **library** and on-line **repository** of existing information, studies, reports and other documents related to the Gowanus neighborhood.

STUDIES + PROPOSALS

- Study of **Whole Foods Brooklyn Variance Application** | *In progress*
- Study of NYC DCP Gowanus Canal Corridor Re-zoning Framework | *Planned*
- Proposal for **Gowanus Industrial Center for Art & Design Proposal** | *Planned*

THINKERS

The **Gowanus Institute** is supported by intellectual contributions from individuals in industry, government and academia with expertise in zoning policy, land use law, workforce & economic development, property development & finance, manufacturing & maritime industries, environmental sciences & policy, and related disciplines.

The **Gowanus Institute** thinkers as of Jan 2012 are:

- **Adam Friedman** | *Pratt Center for Community Development*
- **Alisa Valderrama** | *Natural Resources Defense Council*
- **Ariel Krasnow** | *Supportive Housing Network*
- **Ben Margolis** | *NYC Economic Development Corp*
- **Edward Morris** | *The Canary Project and Saylor/Morris*
- **Elizabeth Demetriou** | *Southwest Brooklyn Industrial Development Corp (SBIDC)*
- **Jessica Fain** | *NYC Department of City Planning, Waterfront*
- **John Shapiro** | *Pratt Institute Graduate Center for Planning & the Environment*
- **Nathan Elbogen** | *XØ Projects Inc and The (OA) Can Factory*
- **Stuart Pertz** | *Urban Planner and Architect*

TANK

The **Gowanus Institute** will maintain a library, conference and exhibition space inside The Old American Can Factory located on the Fifth Street Basin of the Gowanus Canal at the corner of Third Street and Third Avenue, the nexus of the Gowanus neighborhood. Visits are welcome by appointment.

THE GOWANUS INSTITUTE

AT THE OLD AMERICAN CAN FACTORY
232 THIRD STREET #C101 BROOKLYN NY 11215
GOWANUS.MAIL@GMAIL.COM
GOWANUSINSTITUTE.ORG