

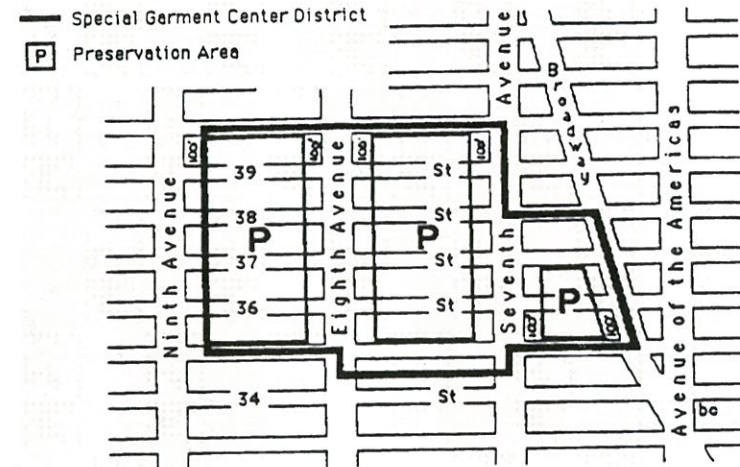


SPECIAL GARMENT CENTER DISTRICT PROPOSED ZONING TEXT AMENDMENT

November 15, 2018

Garment Center History

- Special Garment Center District established in 1987
- Preservation Areas created on side street blocks restricted uses to manufacturing, wholesale showroom, or retail
- Office conversions in Preservation Area allowed only with a CPC Chair certification confirming that another space has been preserved for manufacturing or warehouse

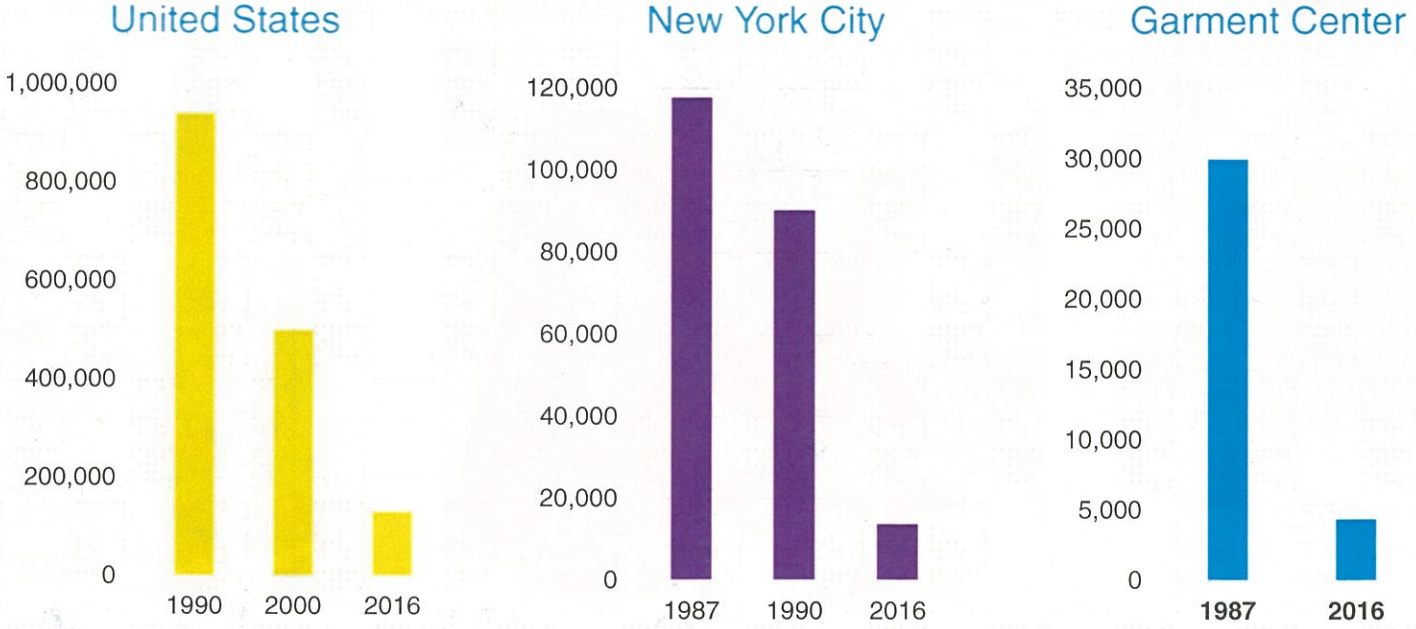


Decline in Apparel Manufacturing

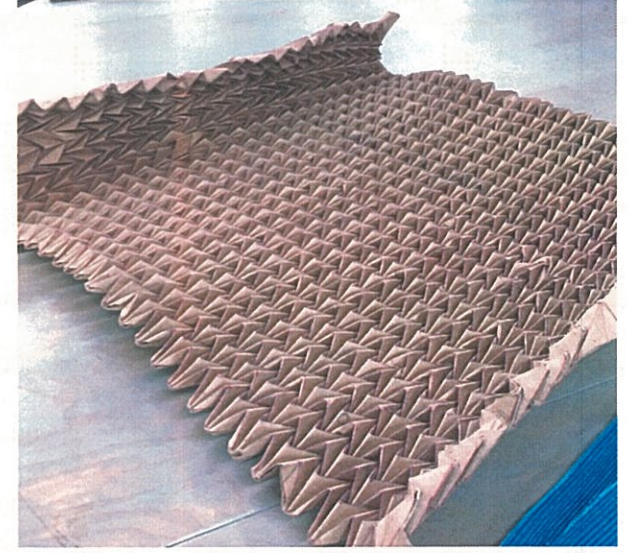


Globalization contributed to a decline in garment production nationally, in New York City, and in the Garment Center

Apparel Manufacturing Jobs



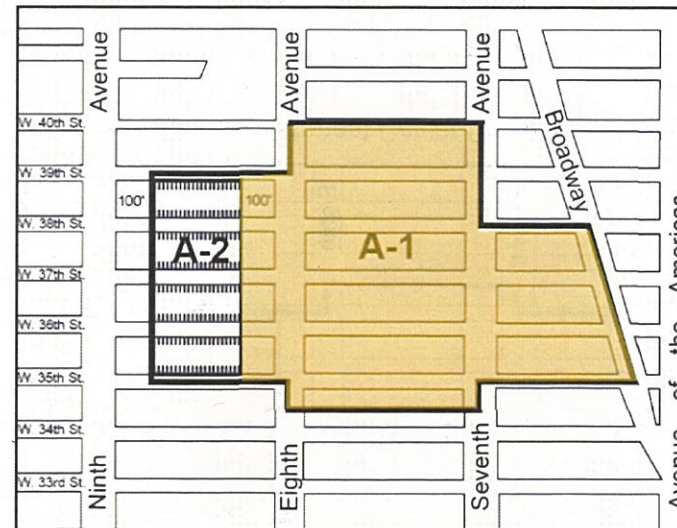
Garment Ecosystem



Proposed Zoning Changes in A-1

A-1 Area:

- Retain M1-6 zoning
- Lift manufacturing preservation requirements
- Modify height and setback regulations in M1-6 to create a better building envelope for offices while reinforcing existing neighborhood character

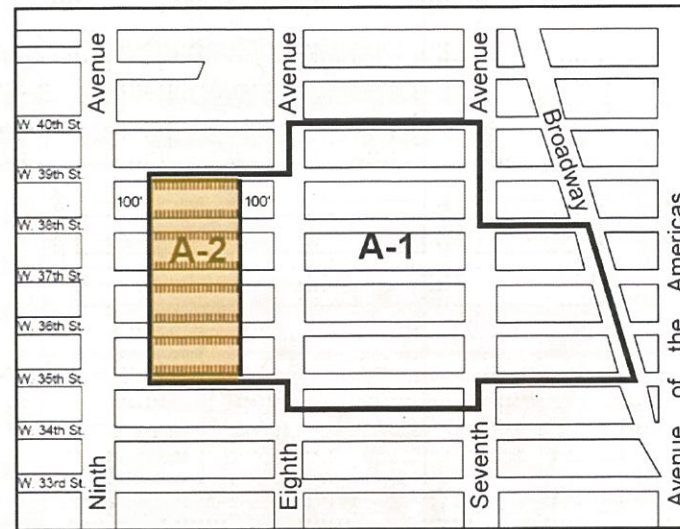


- #Special Garment Center District#
- A-1 Garment Center Subdistrict A-1
- A-2 Garment Center Subdistrict A-2
- ▨ #Street Wall# required pursuant to 121-42 (a)

Proposed Zoning Changes in A-2

A-2 Area:

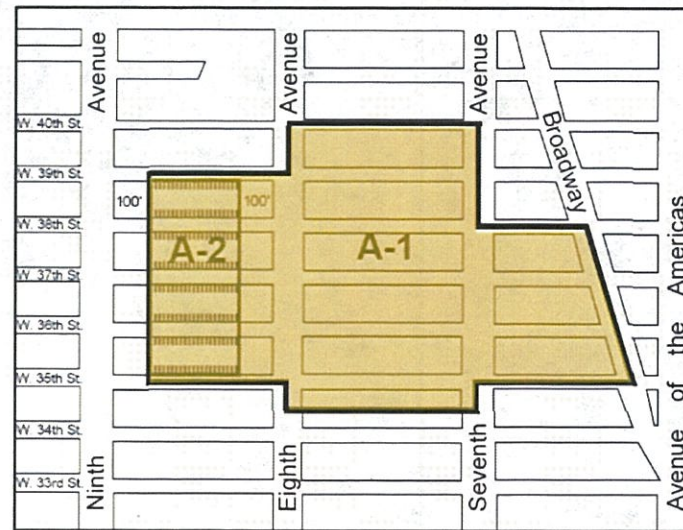
- Maintain existing C6-4M
- Remove manufacturing preservation requirements
- For existing buildings > 70,000 sf:
 - Eliminate CPC authorization for conversion
 - Not allow conversions to residential use
- Flashing signs will no longer be permitted



- #Special Garment Center District#
- A-1 Garment Center Subdistrict A-1
- A-2 Garment Center Subdistrict A-2
- ▤ #Street Wall# required pursuant to 121-42 (a)

Proposed Zoning Changes in the Entire District

- Apply C6-4 sign regulations to entire district.
- Permit new hotels only by CPC Special Permit.



- #Special Garment Center District#
- A-1 Garment Center Subdistrict A-1
- A-2 Garment Center Subdistrict A-2
- - - - - #Street Wall# required pursuant to 121-42 (a)



NYCEDC

New York City Economic Development Corporation
City Council Subcommittee on Zoning and Franchises: Garment Center
James Patchett, President
Thursday, November 15, 2018

Good morning City Council Speaker Johnson, Chair Moya, and members of the Zoning and Franchises Subcommittee. My name is James Patchett, and I am the president of the New York City Economic Development Corporation.

At EDC, it is our goal to make New York City the global model for inclusive innovation and economic growth, fueled by the diversity of our people and our businesses. We are dedicated to bolstering the City's economy, strengthening our neighborhoods, and increasing economic opportunity for all New Yorkers.

The Garment Center holds a remarkable place in New York history and remains a crucial part of our economy. It has been the home of fashion for more than a century, and has allowed New York to claim the title as the fashion capital of the world. It has also offered a critical point of entry to work for generations of immigrants from around the world. Still today, fashion manufacturing plays an important role in ensuring the sector continues to thrive in New York.

However, there has been a steep decline in fashion manufacturing since 1950. It is important to note that these changes are not unique to New York City, and declining trends are similar to those in the rest of New York State and around the nation. Today, people want to spend less on fashion and change clothing more regularly. These systemic trends in the fashion industry, which have coincided with changes in foreign policy and the expansion of globalization, have profoundly affected the sector.

This is why NYCEDC and the City are making historic investments in the sector through a variety of initiatives, including ones that support the industry in the Garment Center and beyond.

Today, I will discuss the current state of the fashion industry and garment manufacturing in New York, recent economic trends in the Garment Center and how the City is supporting the industry, background on the history of Garment Manufacturing and finally the historic package of investments and programs the City unveiled this past June that will support the fashion manufacturing industry.

Before I go into more detail on these items, I would like to recognize the leadership of Speaker Johnson and BP Brewer, as well as members of the Steering Committee, for their continued commitment to this sector and its historic location in the Garment Center. Their leadership greatly influenced the City's support of the industry and made our proposals stronger.

Fashion is both an iconic part of New York's DNA and a critical component of the city's overall economy. Fashion Week alone generates tens of millions of dollars in revenue and continues to make New York the epicenter of the fashion world.

Local garment manufacturing is a critical piece of the NYC fashion ecosystem. It makes us competitive by ensuring we can turn around quality items quickly and conveniently. It also supports the entire industry's design and innovation through prototyping and sample making. It provides emerging designers the ability to produce their collections locally in small samples, and to make their name in this competitive industry. It also allows more established designers to make products in real-time for fashion week and other shows, in addition to differentiating their brand by producing locally.

Since 2014, the City has heavily invested in education, real estate, and programmatic initiatives to support the fashion industry.

Early in the administration, the City committed \$74 million to build FIT's first new building on its campus in decades.

Through a variety of initiatives, the Administration also tripled direct industry investment in from \$5 million to \$15 million. Through partnerships, our goal is to create and retain quality jobs, as well as catalyze innovation and support business and entrepreneurial growth.

Under the umbrella of the Made in New York brand and promotional campaign, NYCEDC has launched a range of initiatives to support the entire value chain of the fashion industry. Highlights of some of these programs include:

- i) *The Future Fashion Graduate Showcase* – which supports the fashion industry's talent pipeline by funding industry internships.
- ii) Micro-financing and retail activations, which support and showcase local designers who produce more than 75% of their products locally;
- iii) *The Fashion Manufacturing Initiative (FMI)*, one of the largest initiatives, which was developed with one of our key partners, the CFDA (Council of Fashion Designers of America). FMI provides direct grants to factories to make investments in their businesses. These range from technology, training and technical assistance, to capital improvements to their space.
- iv) Over the past five years, FMI has distributed \$2.8 million to 25 factories, and is looking to expand its support and investment of fashion manufacturers through the next phase of this program.

During its heyday in 1950, 90 percent of women fashion garments sold in the US were made in the Garment Center. But the vast majority of New Yorkers today are wearing clothes that were manufactured overseas. In 1987, more than 30,000 garment workers occupied nearly 9 million square feet of production space in the neighborhood, and this was still way after the Garment Center's peak. But today, we are left with only roughly 4,400 employees, who occupy only 1.4 million square feet of production space in the district and about half that number in the Preservation Areas. This represents an 85 percent decline in employment and a 92 percent decline in square footage in just three decades.

The Garment District remains a hub for fashion manufacturing, design, showroom, and wholesale businesses, all of which covet the area for its historical cache, proximity to industry businesses, and great transit access. However, in New York City, we have also watched the garment industry decluster and form multiple hubs across the boroughs. This is to take advantage of real estate opportunities and labor proximity.

Today, Sunset Park represents the second largest cluster of garment manufacturing firms outside of the Garment District, with over 100 companies.

The administration is committed to helping to stabilize and grow local garment manufacturing in New York City. One of the most effective and easiest ways for us to achieve this goal is to leverage our assets in existing garment manufacturing clusters.

In Sunset Park, we are investing \$136 million at Bush Terminal to transform a 200,000 square foot building into a dedicated garment manufacturing and film hub. At the new Made In New York Campus, we will maximize our double bottom line and offer tenants affordable rents (\$16-25 per square foot); long-term leases (5-10 years), and at a range of sizes (2-20,000 square feet) accommodating both small and large firms. We have already started demolition at the property, and are targeting construction completion in 2020.

This investment complements those we are making at the Brooklyn Army Terminal— where we already lease over 250,000 square feet of space to fashion-related tenants. Since last summer, FIT has been providing continuing education classes at BAT. We regularly speak to businesses who are interested in moving to these campuses, and are excited to continue growing the second largest fashion manufacturing hub in the City.

The ability for the city to directly provide real estate affordability and stability in the Garment Center is much more complex. We do not own real estate in this neighborhood. On top of that, manufacturing properties are scattered and often mixed in with office uses in the same building.

Today, the Garment Center is a truly mixed-use district and the undeniable home of New York City fashion. Here, fashion-related uses occupy more than half of all leased commercial and manufacturing spaces. Fashion office and showrooms are also on the rise as global businesses want to call the Garment Center their home. Moreover, the unparalleled connectivity is attractive to fashion buyers.

While the Garment Center remains the largest cluster of garment manufacturing in the city with approximately 700,000 square feet of production, representing about 250 firms, left in the Special Zoning District preservation areas – this is also approximately the same amount of square footage located outside of the preservation areas. These firms encompass all subsectors of the fashion production ecosystem from pattern-making, sampling, jewelry and accessories and wholesale.

Additionally, because of its central location in the heart of Midtown Manhattan, the district has also seen a significant increase in hotel construction; there have been more than 5,000 rooms built since 1999. Through the zoning actions in front of you, we want to see a greater diversity in the kinds of development and economic activity in the neighborhood.

As the president of EDC, I would be remiss not to address the incredible job growth the district has experienced over the past decade in sectors outside of fashion manufacturing. The district has seen an extraordinary influx of new office space in loft buildings, which has led to the creation of thousands of new jobs. This represents a 56 percent increase in jobs from 2000 to 2016. This approximately 12 block area now contains over 66,000 jobs, which is truly remarkable. Over half of employment in the district is now in the creative economy. There are many non-for-profits, education, health/care, and tech start-ups, and architecture/engineering firms starting here and growing. Many of these new jobs represent small firms, generally less than 15 employees and occupying 3,000 square feet on average. In a city that has lost more than 6 million square feet of class B office space since 2000, the Garment District's stock of historic buildings with smaller floorplates has proven attractive to small and emerging firms seeking flexible, affordable office space.

To respond to these changing economic trends in the Garment Center and, in particular, the continuing decline in garment manufacturing in its historic core, Speaker Johnson and Manhattan Borough President Brewer convened and co-chaired the new Garment Center Steering Committee. It identified non-zoning based solutions to help stabilize garment manufacturing in the historic home of fashion and worked to ensure the continued presence and vibrancy of the industry in Midtown.

The Steering Committee was comprised of a group of stakeholders representing the industry, community boards, advocacy organizations, and real estate interest. The group met for three months during summer 2017 and released a report in August 2017, which identified a set of recommendations for three topics: real estate, workforce development, and placemaking.

Real estate stability proved to be the Steering Committee's main priority. Real estate stability is critical to any business, but particularly for garment manufacturers, where it helps enable long-term business decisions, such as investment in new machinery and technology, and capital improvements to a space.

Continued programmatic support in workforce development, marketing assistance, and placemaking were also discussed and deemed important to further stabilize the industry.

As I mentioned earlier, given the lack of city-owned real estate in the Garment Center, which is typically the easiest way for the city to provide long-term stability for industrial businesses, the Steering Committee coalesced around the need to be creative and study the possibility of using other real estate tools, such as IDA and acquisition, to incentivize and partner with GC landlords to allow for long-term affordable leases in the Garment Center.

One of the first and major initiatives we developed in response to the Steering Committee was a custom tax incentive program through the NYCIDA to preserve fashion manufacturing space in the Garment Center by offering affordable long-term leases.

Through the program, property owners are required to offer long-term leases at a minimum of 15 year lease terms, capped at maximum gross rents of \$35 per square foot with escalations. This price includes all utilities and any fees for property management, and is the upper limit of the rent. Many businesses will continue to pay much less.

First and foremost, the program was conceived to support fashion manufacturers. However, the Steering Committee and other industry stakeholders pushed us to think beyond fashion manufacturers and look at every type of business along the fashion production supply chain. So we expanded the fashion manufacturing definition to include suppliers and costume makers, which are also integral to New York City's fashion ecosystem.

Our NYCIDA program will be overseen by a dedicated compliance staff in my agency. Annual compliance review under our program includes annual certifications from both the property owner and tenants.

The NYCIDA Program was officially launched in June, with the target of preserving 500,000 square feet of fashion manufacturing space in the Garment Center.

It is important to note that the Program is eligible within the entire GC BID boundary. Zoning preservation areas are not a predictor of actual location of the industry- as I noted earlier, half of garment manufacturing is outside of Preservation Areas. The IDA program is open to building owners within the boundaries of the new Garment Center BID.

As mentioned, the program currently requires that participating property owners give their tenants long-term and affordable leases, and under guidance from the Speaker and BP we are looking into extension options at the election of the property owner after the initial 15-year term.

Starting at 25,000 SF of fashion manufacturing space, property owners will receive \$1 of tax abatement applied to the gross square footage of their building (\$1/sf for every 25,000 SF). So if a property is 100,000 GSF in size and the building has 50,000 SF of GM space, the property would receive \$200,000 in tax

abatement per year. This equates to considerable tax savings for property owners. We also expanded our search for eligible properties by opening up the program to buildings that may have closer to 20,000 square feet of fashion manufacturing space.

We are actively working with multiple owners to secure 300,000 square feet of garment manufacturing space. In September, the NYCIDA Board has authorized three properties totaling 200,000 square feet of fashion manufacturing space in the Garment Center, and I believe a few owners enrolled in the IDA Program are here today as well. For fashion businesses in these buildings, this means considerable real estate security and longevity.

We are in active conversations with property owners to enroll more space into the program, and are fully committed to continue aggressively marketing this program. Our goal is to sign up as many buildings as possible, and provide long-term stability in the district.

A long-term goal of the Steering Committee, in addition to IDA, is also securing a building in the Garment Center. We have made good on our promise to help achieve this goal by releasing a Request for Expressions of Interest last month; this will provide up to \$20 million in city capital to acquire a building and secure a non-profit partner to operate and maintain the new fashion hub. The RFEI requires that the respondent provide their own equity in the building, and be responsible for obtaining financing, if necessary, to help finance the acquisition.

We are confident that the City's historic commitment of \$20 million in funding will enable the acquisition of a sizeable building for dedicated garment space.

For the RFEI, we purposefully created a procurement process that would allow for as much flexibility as possible, considering the variability of the real estate market and the need for a strong partnership between owners looking to sell and a non-for-profit partner to manage. The RFEI will receive proposals on a rolling basis for one year, from November 2nd through November 1st of next year.

At the suggestion of the Steering Committee, we expanded the eligible geographic boundary for the RFEI beyond the Garment Center Special Zoning District and BID boundary. The boundaries are now all the way south to West 26th Street, as far west as 11th avenue, and east to 5th avenue to make the RFEI attractive.

The public benefits for tenants are clear, and will match the IDA program. At minimum, these will be 15 year leases, and will be capped at \$35 per square feet with escalations.

We are very excited about this prospect and know that many fashion manufacturers share our enthusiasm for this initiative.

Finally, I would like to touch on programmatic support, the last area of the steering committee's recommendations.

As part of the Garment Center Steering Committee recommendations, the City, CFDA and the Garment District Alliance, which is the BID representing the area, have agreed to fund and deploy a set of programs to support garment manufacturers and designers committed to local production.

This builds upon many years of collaboration between CFDA and the city, with \$2.8M spent to support technology invocation. To date, these grants have supported more than 30 businesses. We are currently working with CFDA on a new scope of work that would total \$14 million of direct investments in the industry citywide.

We are very proud and excited about this collaboration. Priority areas have been established as continued technology modernization and workforce development, to support competition and innovation, and train the next generation of skilled workers. Other programmatic supports to businesses include industry organization and technical assistance, which are necessary to provide businesses with the support they need to operate in a global environment and changing fashion industry. This is in addition to marketing and branding to both advertise and celebrate the incredible skills and products that come out of local production, aimed at shifting consumer's appreciation and understanding of the benefits of local production. And finally, identifying opportunities to incentivize local production and help re-shore manufacturing.

Additionally, the BID was approved by the City Council just yesterday for an up to \$2.5M/ year assessment over 10 years, which is a unique commitment from the district to support this historic industry.

This suite of programs, in addition to custom real estate programs, represent an unprecedented and comprehensive approach to providing stability for and growing the garment manufacturing industry in the Garment Center. We are proud to be part of this new chapter for the industry and the district.

Thank you for your time.

Programs to Support the Garment & Fashion Industry

New York City Council Subcommittee on
Zoning and Franchises Hearing
November 15, 2018

NYCEDC

NO STANDING
Anytime
←

3
hour
metered
parking
COMMERCIAL
VEHICLES ONLY
OTHERS NO STANDING
Monday - Friday
6am - 7pm
→

Agenda

**Fashion & Garment
Manufacturing in NYC Today**

**Garment Center Steering
Committee Process &
Recommendations**

**NYCIDA Garment Center
Program & Building Acquisition
for Production Space**

Fashion Manufacturing Support



Fashion Industry in NYC Today

Fashion is an iconic part of New York, both as a signifier of culture and as one of the global centers of the Fashion Industry.

The Fashion Industry is a major economic contributor to the City:

- Over **\$11B** in wages paid
- Over **\$3B** in taxes generated

Local manufacturing is critical to the overall Fashion Industry:

- Emerging designers (<\$3-5M revenue) rely on local production and are key to NYC design innovation and competitiveness in fashion
- Established designers tend to use local production for product development, samples and reorders



NYC Fashion Week



Interior of garment manufacturing business

City's Commitment to the Fashion Industry

The City has heavily invested in the Fashion Industry since 2014

New State-of-the-Art Academic Building at the Fashion Institute of Technology (FIT):

- **\$74 million investment**
- Matches \$74 million investment by State (**\$148 million total**)
- Provides **100,000 SF** of academic and student life spaces, including smart classrooms, studios, laboratories, and display and exhibition spaces.



Made in New York Fashion Programs:

- **\$15 million commitment**
- Programs targeting support to fashion design, education, production, financing, and retail
- **Awarded \$7 million** in grants and loans to **38 fashion businesses**
- Generated over **\$500,000** in revenue for NYC-based fashion brands



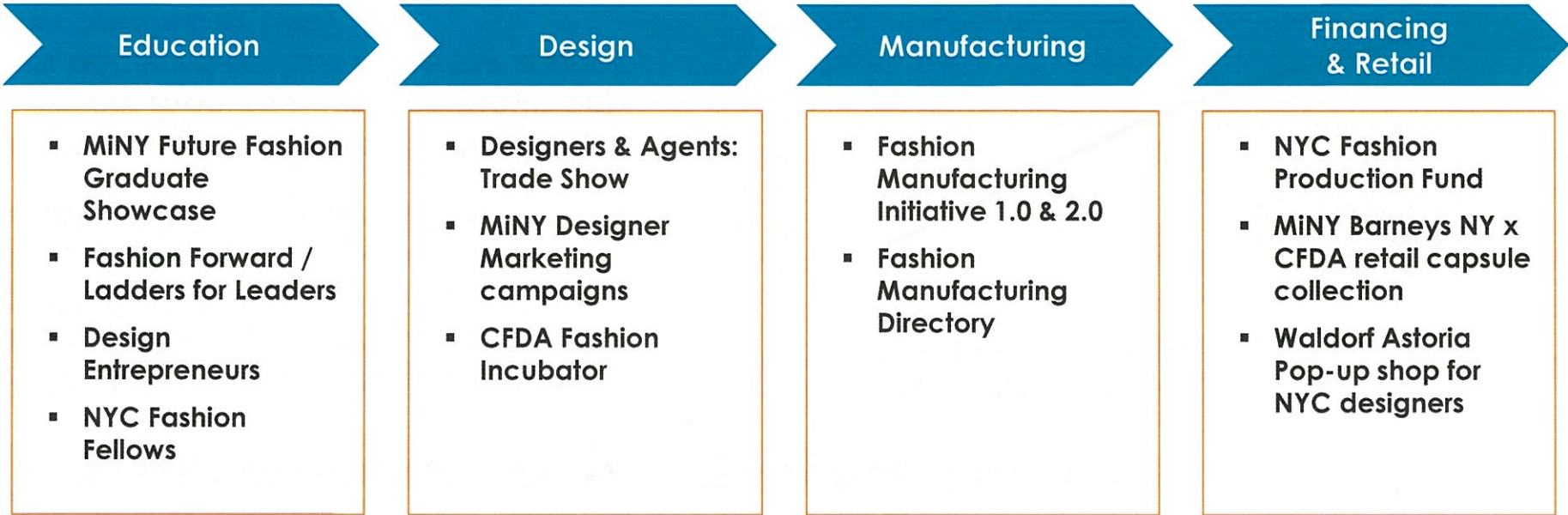
NYCEDC Fashion Portfolio



NYCEDC Fashion Programs have provided \$15M in support to the industry through programs targeting fashion design, education, production, financing, and retail

The City's **Made in NY Fashion** programs **create and retain quality jobs, catalyze innovation** within and across the industry, and **support business and entrepreneurship growth.**

Our **public-private partnerships** are designed with the entire **supply chain** in mind, and generate **talent** development and **education, financing** tools, stakeholder convening and **networks**, as well as **technology and infrastructure** investments.

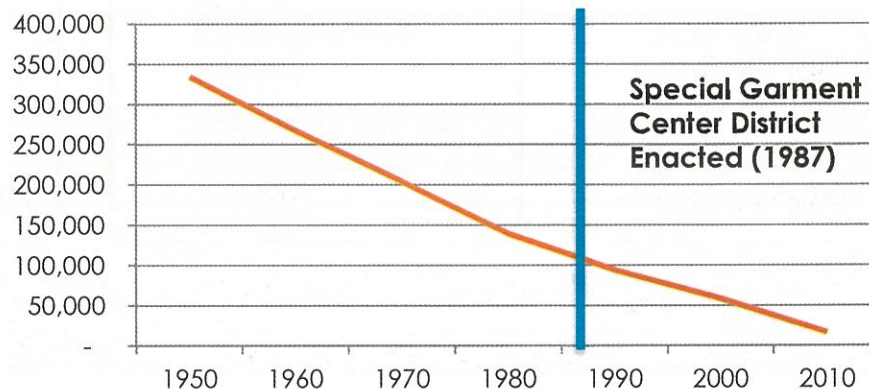


Garment Manufacturing Employment in NYC

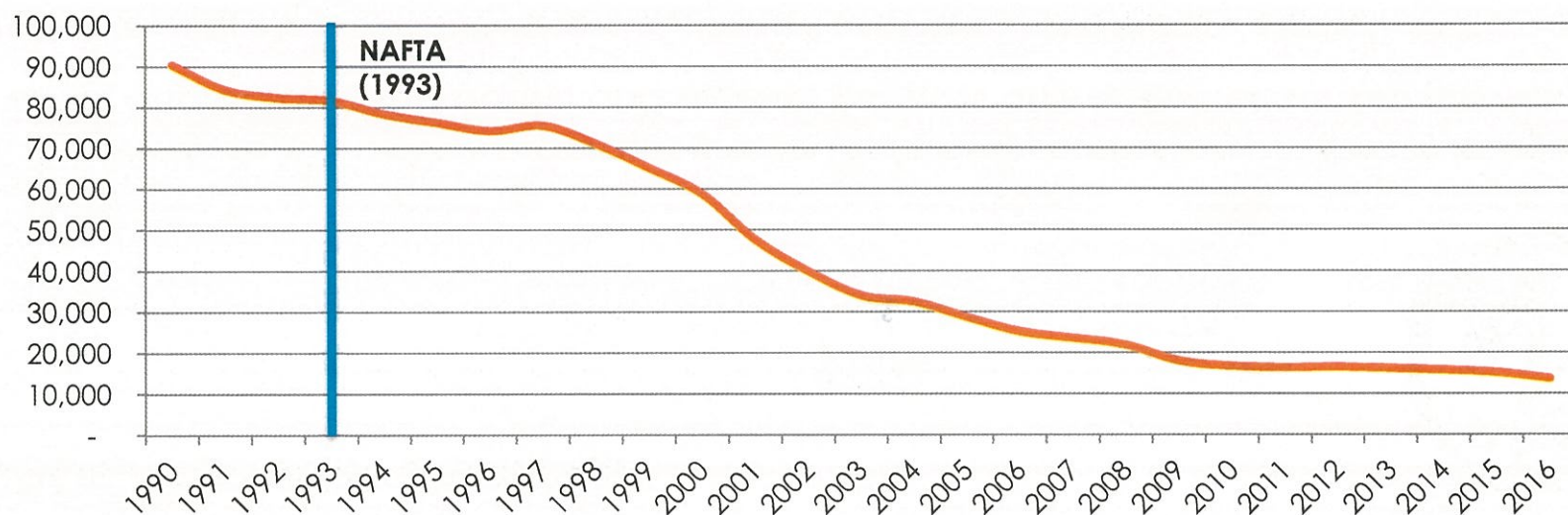
NYC-based garment manufacturing has experienced decades of global business competition, which have contributed to a steep decline in employment since the 1950s

In the Special Garment Center District, garment manufacturing employment has declined by 85% since the district was created in 1987

NYC Apparel Manufacturing Employment, 1950 to 2010



NYC Apparel Manufacturing Employment, 1990 to 2016



Source: U.S. Census; NYS DOL

Garment Manufacturing Clusters in NYC

The Garment District remains a fashion hub with approx. 400 firms

However, garment manufacturing has become an increasingly de-clustered industry with 1,568 firms citywide

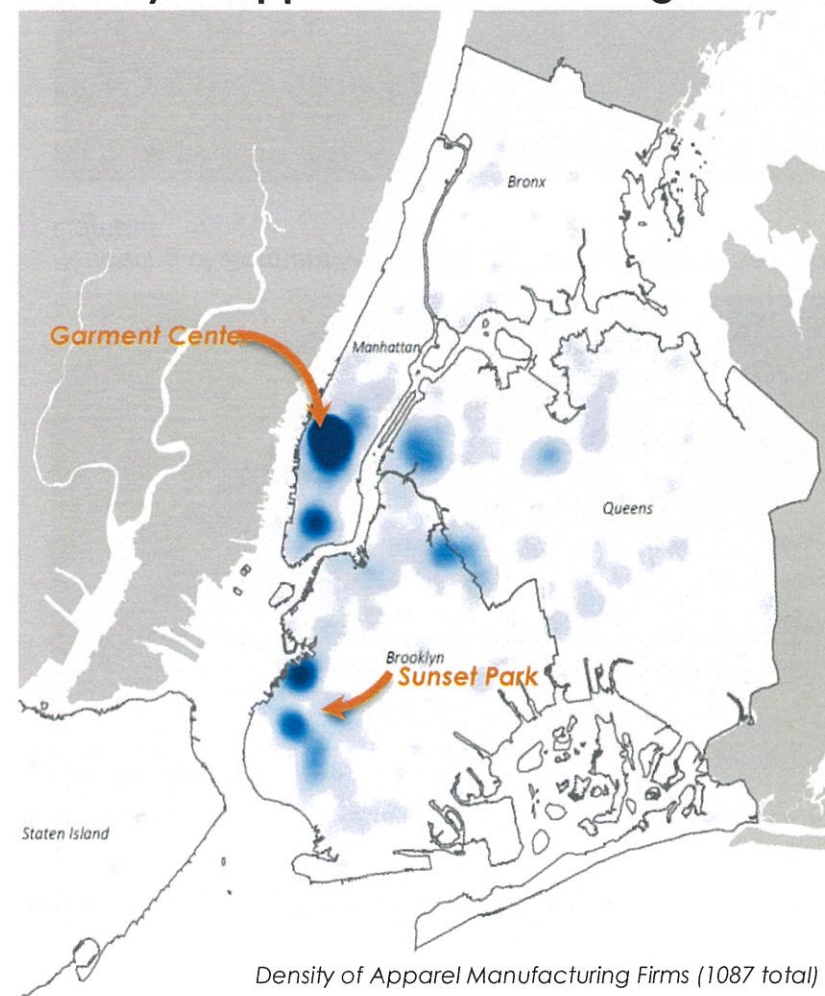
Designers especially have built small clusters in SoHo, Tribeca, and the Meatpacking District

The industry has found other locations to grow and thrive across the city:

- Sunset Park (100+ firms)
- Long Island City (70+ firms)
- Chinatown
- Brooklyn Navy Yard
- East Williamsburg/Bushwick/Maspeth/Ridgewood

Sunset Park is now the second largest cluster of garment manufacturing firms outside of the Garment District with over 100 firms

Density of Apparel Manufacturing Firms



NYC Department of City Planning, March 2016
Source: NYSDOL Quarterly Census of Employment and Wages 2014 3rd quarter

As of 2014, there were 1,568 garment manufacturing firms citywide.
Source: County Business Pattern 2014

Sunset Park Fashion Manufacturing Strategy: Investing in City-Owned Assets

NYCEDC currently has 270,000 SF of fashion-related tenants in Sunset Park

Bush Terminal Made in New York Campus

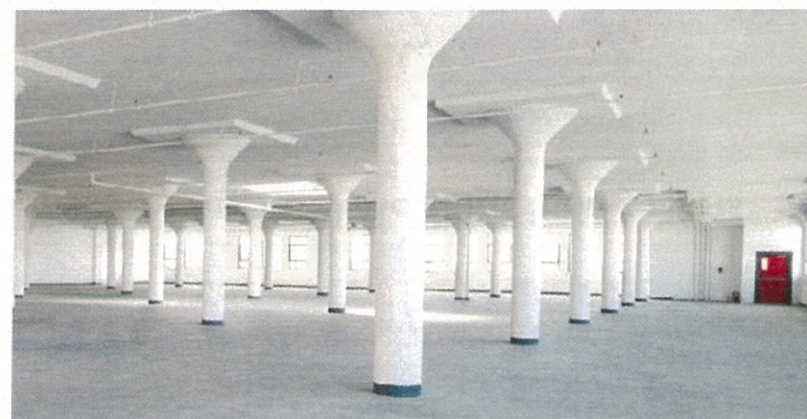
- **\$136M** investment
- 200,000 SF newly renovated, dedicated garment manufacturing hub
- Renovation completion in 2020
- \$16-25 psf; 5-10 yr. lease term



Rendering of Garment Manufacturing Hub at Made in New York Campus

Brooklyn Army Terminal (BAT)

- **\$100M+** investment
- \$15-25 psf; 5-10 yr lease term
- Recent fashion tenants include Mudo Fashion + FabScrap
- FIT hosting classes at BAT Annex since June 2017

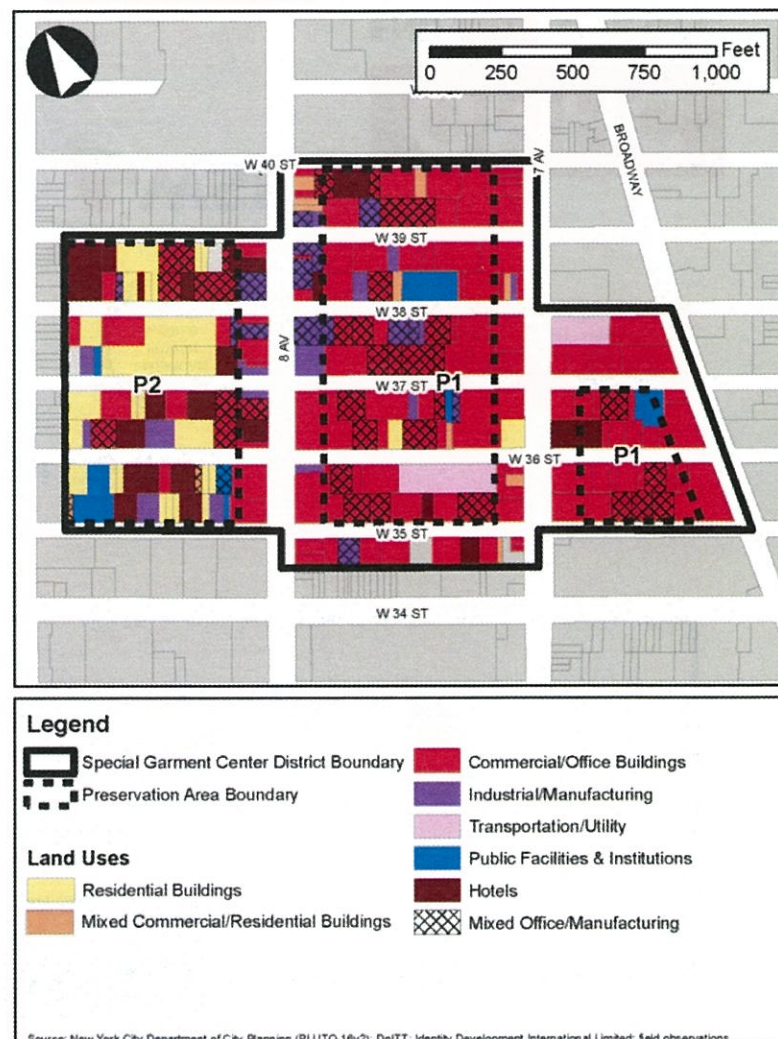


Industrial space at Brooklyn Army Terminal

Garment District Today

The home of NYC Fashion and increasingly a mixed-use commercial and manufacturing district

- Fashion-related uses occupy more than 50% of leased commercial (non-hotel) and manufacturing building area in P1 and P2
- Fashion companies from around the world are seeking to locate in the Garment District to establish their global HQs
- Approx. 700K SF of fashion production located within the Preservation Areas with the equivalent amount located in the District
- While production has declined, fashion office and showrooms are on the rise
- **56%** job growth between 2000-2016; overall employment now totals approx. **66,000 jobs** (2016)
- 22 hotels operating over 5,000 rooms built or in development since 1999



Garment District Today: Significant Job Growth

Job Highlights (Special District):

- Tremendous job growth between 2000-2016 (+56%)
- Overall employment of 66,000 (2016)
- Over half of all employment in creative economy (59%)
- District remains a hub for fashion jobs and firms
- Small firms (avg. ~3K SF per firm)

Firms located in the Garment Center:



END AIDS. LIVE LIFE.

VOORSANGERARCHITECTSPC



END AIDS. LIVE LIFE.

Garment Center Steering Committee Process

Co-chaired by Speaker Johnson &
Manhattan Borough President Gale Brewer

Steering Committee Timeline:

- Steering Committee met for 3 months in Summer 2017
- Steering Committee Report released in August 2017

Goals for Steering Committee:

- Identify non-zoning based solutions to retain and promote a garment manufacturing hub in the Garment Center;
- Support garment manufacturers and the larger garment industry's long-term presence in mid-Manhattan;
- Celebrate the industry's past and future; and
- Support the Garment District in its transition to a successful mixed-used neighborhood that continues to include the garment industry

Report GARMENT CENTER STEERING COMMITTEE & Recommendations



Garment Center Steering Committee Recommendations

Real Estate

- Create custom IDA program
- Advance framework for public-private building purchase
- Hotel Special Permit
- Support role of nonprofit partner(s)

Workforce Development & Business Support

- Business planning and marketing support
- Develop communications platform
- Workforce development programs

Placemaking

- Improved signage and wayfinding
- Circulation and streetscape enhancements
- Online directory of garment businesses

NYCIDA Garment Center Program

Program Goals

- Enable Fashion Manufacturers to maintain a presence in the Garment Center through affordable, long-term leases
- Supports fashion ecosystem by providing real estate stability to Fashion Manufacturers
- Program is right sized to preserve 500,000 SF of Fashion Manufacturing space in the Garment Center

Program Requirements for Property Owners

- **Maximum gross rent of \$35 PSF** (all expenses included)
- **Minimum 15 year lease** term
- Landlord subject to penalty schedule and **annual compliance review (Property Owner and Tenant Certifications)**

NYCIDA Garment Center Program Terms

	Participating Property Requirements	
Eligible Geography	Garment Center BID	
Term Length	Minimum 15 years + <i>renewal options</i>	
Fashion Manufacturer SF / Property	Preference for > 25,000 SF	
Rent Cap	\$35 PSF (all expenses included)	
City Commitment	Total Fashion Mfg. SF	Real Estate Tax Benefit / SF of Fashion Mfg.
	25,000	\$1.00
	50,000	\$2.00
	75,000	\$3.00
	100,000	\$4.00
<p><i>Note: \$0.04 of Real Estate Tax Benefit for each 1,000 SF of GM preserved above 25,000 SF. Benefit is applied to Property's GSF.</i></p>		

Garment Center Building Acquisition Request for Expressions of Interest (RFEI)

Steering Committee Recommendations:

- Advance a framework for public-private building purchase for dedicated garment production space in mid-Manhattan
- Support the role of nonprofit partner(s) in efforts to preserve and expand a core of garment manufacturers in mid-Manhattan

Building Acquisition Strategy & Process:

- City commits up to **\$20M** in City funding to facilitate purchase of Garment Center Building with non-profit partner to operate and manage as dedicated garment production space
- RFEI released 10/3/18; RFEI Info Session held 10/25/18
- Rolling submission deadline; Proposals accepted from 11/2/18 – 11/1/19

Garment Center Building Acquisition RFEI

Property Requirements

Eligible Geography	W42 nd – W26 th Sts; 5 th – 11 th Aves
Respondent Partner	Preference for non-profit partner
Term Length	N/A - Building Purchase
Existing Fashion Manufacturer SF / Property	Preference for < 25,000 SF
Rent Cap	\$35 PSF (all expenses included)
City Commitment	<u>Up to \$20MM City Funding</u>

City, CFDA, GDA Investment in Fashion Manufacturing

Programmatic support is an important component of stability and growth for fashion manufacturing businesses

Modernization & Investment in Technology

Grants for:

- 3D printers
- Body scanners

Workforce Development

- Apprenticeships
- New technology training (CAD)

Industry Organization & Technical Assistance

- B2B Networking
- Business Planning

Marketing & Branding

- Online Promotion
- Digital Directory

Increasing Demand for Local Production

- Program to incentivize local production

Questions?

THE DEPARTMENT OF HOUSING PRESERVATION AND DEVELOPMENT

L. U. # Pre-Considered

Marcus Garvey Village/Rezoning

November 15, 2018

(Barron) Land Use Numbers –C180485HAK,

C180486PCK, N180487ZRK, C180488ZSK, C180489ZMK, and

C180490ZSK are six actions related to the development of Marcus

Garvey Village in Brooklyn Council District 42. The applications are

co-sponsored by the City and private development team and will

facilitate new construction of multiple dwelling buildings in

Brownsville.

As you heard, the project area consists of private sites as well as City-

owned property located at **Block 3587, Lot 27 and Block 3588, Lots 32,**

33, 34, 35 and 36. The City-owned property accounts for approximately

5,517 sq. ft of the development area (or approximately 4% of the project

area). The City-owned lots were once designated urban renewal sites as

part of the Marcus Garvey Urban Renewal Plan (URP) which was

approved in 1968. Although the URP expired in 2008, the City-owned

sites will be developed with residential uses as originally envisioned.

THE DEPARTMENT OF HOUSING PRESERVATION AND DEVELOPMENT

L. U. # Pre-Considered

Marcus Garvey Village/Rezoning

November 15, 2018

To briefly summarize the portion of the ULURP action in which HPD is co-applicant, we are seeking approval of disposition pursuant to 197-c of **Block 3587, Lot 27 and Block 3588, Lots 32, 33, 34, 35 and 36** in order to convey the land to the sponsor, Brownsville Livonia South Housing Development Fund Corporation, (Sponsor). Currently, Block 3588, Lots 32-36 are a GreenThumb Garden currently under the jurisdiction of the Department of Parks and Recreation (DPR) and Block 3587, Lot 27 is an unimproved vacant lot under the jurisdiction of HPD.

The Sponsor is proposing to develop the project under HPD's Extremely Low and Low Affordable Program (ELLA). Under the ELLA program, sponsors purchase City-owned or privately owned sites and construct multifamily rental housing affordable to low-income families with a range of incomes from 30% to 80% of the Area Median Income ("AMI"). Projects may include a tier of units with rents affordable to households earning up to 100% of AMI and subject to

THE DEPARTMENT OF HOUSING PRESERVATION AND DEVELOPMENT

L. U. # Pre-Considered

Marcus Garvey Village/Rezoning

November 15, 2018

project underwriting, up to 30% of the units may be rented to formerly homeless families and individuals.

The buildings that will be developed on the City-owned sites and adjacent privately-owned lots on Development Sites C and E will have a mixture of unit types including 18 studios, 59 one-bedroom, 59 two-bedroom and 30 three-bedroom for a total of approximately 166 rental apartments. Anticipated rents will range from \$215 for a studio at the 30% AMI tier to \$1,472 for a three-bedroom apartment at the 80% AMI tier.

Additionally, the Department of Parks and Recreation and the Department of Citywide Administrative Services are co-applicants for the site selection and acquisition of property located at Block 3559, p/o Lot 1. Given the City will be conveying the existing garden site (which measures approximately 3,000 sf) to the Sponsor, the acquisition and site selection by the City of the 5,236 sf Acquisition Site and the 892 sf Easement Area for use as a community garden. The new community

THE DEPARTMENT OF HOUSING PRESERVATION AND DEVELOPMENT

L. U. # Pre-Considered

Marcus Garvey Village/Rezoning

November 15, 2018

garden on the Acquisition Site and Easement Area will be approximately 6,128 sf, more than twice the size of the existing approximately 3,000 sf community garden.

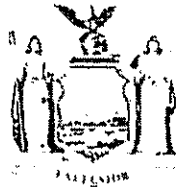
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SENATOR
KEVIN S. PARKER
11ST SENATORIAL DISTRICT
STATE OF NEW YORK

DEMOCRATIC CONFERENCE WHIP

ALBANY OFFICE:
ROOM 404
LEGISLATIVE OFFICE BUILDING
ALBANY NY 12247
PHONE: 518 455 2580
FAX: 518 455 6843

DISTRICT OFFICE:
2021 THEDEN AVENUE 11TH FLOOR
BROOKLYN NY 11226 5807
PHONE: (718) 629 6401
FAX: (718) 629 5401

e-mail:
parker@ny senate.gov

SEP 06 2018

August 22, 2018

Daniel Whitehead
Chief Administrator
NYS Department of Environmental Conservation
625 Broadway
Albany, N.Y. 12233

Re: Cornell Realty Hearing Comments - **Objections to Negative Declaration**
CEQR # 17DCPO67K
ULURP# 180347ZMK and N180348ZRK

Dear Mr. Whitehead:

I write on behalf of my constituency regarding the Brooklyn Botanic Garden (BBG) and the proposed capital projects that are being planned along its perimeter. It has come to my attention that there are two (2) proposed developments being considered within a four block radius of the BBG; all adjacent to each other and in a height limited zone of 6/7 stories.

One of the projects is being proposed by Cornell Realty, who is looking to build two 175ft story buildings. The other project is by The Continuum group who is proposing to erect a 42-story building that would be the largest residential building in Brooklyn. Both projects are proposing to add over 2,200 residential units within a four block radius.

However, after reviewing the Cornell Realty Environmental Assessment Statement (EAS) that is required by New York State law (SEQR), there appears to be gross errors or a serious misrepresentation of facts in the statement. This in turn has prevented their application from being subject to an environmental impact analysis to determine the negative environmental consequences to the community, the garden, and our water and sewage facilities.

For example, on Cornell Realty's EAS short statement form it asks if their project would create over 400 residential units. Cornell Realty responded "no." Thus, they did not perform an analysis of the water and sewage impact. However, on their application it clearly shows that their project will create

516 residential units, and another area that will also be rezoned will create an additional 47 residential units for a combined 565 units.

Additionally and as you may already know, cumulative impacts must also be considered under the SEQR law; especially when the projects are right next to each other and will be utilizing the same resources. In the case of these two proposed developments, they are in fact adjacent to each other. This makes me concerned that ultimately these developments will pose a serious environmental threat not only to the Brooklyn Botanic Garden, but also to the larger Brooklyn community.

Another issue that is of concern is the fact that the Cornell Realty Shadow Study shows signs of being defective. The CEQR manual that has been created by New York City to enforce the SEQR laws - to determine if a negative impact will occur and if an environmental impact statement is warranted, appears not to have been adhered to as is required. For example, there is evidence that the Cornell Realty application did not implement the worst-case scenario requirement when conducting their shadow study, as is required by the CEQR manual. That in fact, it appears that Cornell did not include the bulkhead of the buildings and any additional heights that they will be afforded regarding special permits, i.e. the FRESH program.

Pursuant to the Section 6 NYCRR 617.7 and .8 (State Environmental Quality Review), a lead agency must be chosen to ensure a proper analysis is done to determine if an environmental impact statement must be conducted and the New York City Department of City Planning (DCP), is the lead agency.

According to documents submitted to my office, the DCP has given this project a negative declaration and thus no further environmental review will be warranted from Cornell Realty.

According to Section 6 NYCRR 617.7 (e) any time before a final determination is made the lead agency may withdraw their negative declaration and issue another finding, especially if new information has been given to the lead agency to warrant such a reversal of its determination.

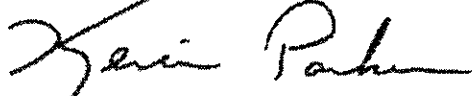
Thus, I request that Cornell Realty's application be reviewed for accuracy to determine if their EAS has been conducted appropriately, and that you keep me apprised of your findings - which should include, as SEQR requires, a description of the lead agency's rationale, and the qualitative data that informed the agency's determination.

Please consider the following environmental consequences when assessing the Cornell Realty application:

1. Cumulative impacts from other proposed developments and all properties within the proposed rezoned area.
2. Shadow impact and following the CERA manual directives.
3. Water and Sewage analysis
4. Socioeconomic Conditions - Especially in light of the fact that luxury developments will be built in a low to moderate-income community.
5. Segmentation (assuring that all properties that are being rezoned are analyzed)
6. Sun - Glare especially in relation to the Brooklyn Botanic Garden

Thank you in advance for your prompt response and favorable consideration of this request. If you have any further questions, please feel free to contact me at my district office at (718) 629- 6401.

Yours in Partnership.



KEVIN PARKER

cc: Bill de Blasio, Mayor, City of New York
Yvette Clarke, U.S. Representative, N.Y. 9
Eric Adams, Brooklyn Borough President
Walter Mosley, New York State Assembly Member, District 57
Diana Richardson, New York State Assembly Member, District 43
Bobby Carrol, New York State Assembly Member, District 44
Laurie Cumbo, New York City Council Member, District 35
Winston R. Von Engel, Director, NYC Department of City Planning
Patricia Baker, Chairperson, Community Board 9, Brooklyn, NY
Alicia Boyd, Movement to Protect the People (MIOPP)
Felice Robertson, Vice President, Washington Avenue Botanic Block Association



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BOROUGH OF MANHATTAN
THE CITY OF NEW YORK

1 Centre Street, 19th floor, New York, NY 10007
(212) 669-8300 p (212) 669-4306 f
431 West 125th Street, New York, NY 10027
(212) 531-1609 p (212) 531-4615 f
www.manhattanbp.nyc.gov

Gale A. Brewer, Borough President

November 15, 2018

**Testimony of Manhattan Borough President Gale A. Brewer to
New York City Council – Subcommittee on Zoning and Franchises
Special Garment Center Zoning Text Amendment: N 180373 ZRM
By New York City Department of City Planning and New York City Economic
Development Corporation**

Good morning Chair Moya and members of the Subcommittee. My name is James Lloyd, Deputy Director of Land Use for Manhattan Borough President Gale A. Brewer, and I am here to make a statement on her behalf in support of our plan for preserving a significant core of garment manufacturing in Manhattan.

The application for a zoning text amendment to the Special Garment Center District before you today is a component of our plan. However, the success of the Garment Center depends on the success of all the components, including the purchase of a building for permanent manufacturing use, an IDA tax abatement program, and significant financial commitments from the Garment District Alliance and the Council of Fashion Designers of America.

I call the plan “our” plan because the Garment Center Steering Committee, formed by Council Speaker Johnson and the Borough President, has played an instrumental part in the proposal before you today. I would like to thank all the elected officials, Community Boards 4 and 5, EDC, and representatives of manufacturers, designers, unions, and real estate for their continued efforts. Their recommendations have provided valuable guidance for addressing the needs of the garment industry. Through their collective efforts, we have come a long way from the original proposal to lift the zoning restrictions and not provide any accompanying assistance for the garment industry and specifically manufacturers, located in Manhattan’s historic Garment Center.

The EDC programs that accompany the rezoning are a result of the Steering Committee recommendations, which prioritize the preservation of manufacturing space in the Garment Center through a tax incentive program and a building purchase. I would not be supporting this application to lift the current preservation requirements if there were no assurances that manufacturing space would be maintained through these methods. These EDC programs, which incentivize the provision of affordable manufacturing space, are available only within the Garment Center area. An Industrial Development Agency (IDA) incentive will provide property tax abatements for landlords who sign 15-year leases with manufacturing tenants. A second program designed to assist in the acquisition of a garment manufacturing building will benefit from \$20 million in City funding. Both initiatives will provide garment production space at an affordable rate of \$35 or less per square foot.

Together, the building acquisition and IDA program will provide stability to the garment companies that have recently had to deal with escalating rents and evictions resulting from so many landlords illegally converting their buildings into offices. Without these two commitments, the future of the Garment Center would be greatly at risk. My office has been hearing from firms that are having difficulty renewing their leases and are facing rising rents.

Additionally, financial commitments from the Garment District Alliance and the Council of Fashion Designers of America will provide valuable support to the manufacturers themselves. Such commitments involve incentives to produce in the City as well as programming to foster the fashion industry in the Garment Center.

In my official recommendation dated August 20, 2018, I noted that the following three conditions must be accomplished prior to approval of the zoning text amendment:

1. EDC must demonstrate that it has or expects to receive one or more credible responses to the RFEI and feasible sites must have been identified or EDC must be making any necessary changes to the RFEI to accomplish those goals.

2. The City must also commit to a reasonable amount of additional funding beyond \$20 million should that amount prove inadequate.
3. The IDA must have approved, or have pending before it, applications for the 300,000 square feet of space for which EDC currently has signed letters of intent. Additionally, EDC, with the assistance of the Garment District Alliance, must make every conceivable effort to obtain as much additional square footage for the IDA program so that at a minimum 500,000 total square feet is preserved.

On September 18th, the IDA Board approved the participation of three buildings in its program. These buildings total 200,000 square feet. I know EDC is working hard and is currently in talks with other landlords in the area to get to those 300,000 square feet. We absolutely need to preserve as much manufacturing square footage as possible, and that requires participation not just from the City and the Garment District Alliance, but the real estate industry as well.

EDC released its RFEI in October, which is a crucial step toward securing affordable garment manufacturing space. But if it appears that the \$20 million committed by the City may not be sufficient, or that other forms of support or flexibility are required to make the building acquisition a reality, we need to be committed to pursuing such support or flexibility. I remain hopeful that the City will make available additional resources as necessary to secure the acquisition of a garment manufacturing building.

I strongly encourage everyone to work together to ensure that the fashion industry—which brings incredible vitality and economic activity to our city—can stay in the Garment Center. We very much need participation from the area's landlords in both the IDA program and the RFEI, as we need to secure more affordable garment manufacturing space to bring this plan to fruition. The Council of Fashion Designers of America and EDC are partnering to commit millions of dollars to incentivize local manufacturing, and we look forward to seeing their programs take off. Additionally, as we stated yesterday to the Finance Committee as it considered an assessment increase for the Garment District Alliance, the BID must make a reasonably long-term commitment to collect and spend 2.5 million dollars each year to improve economic conditions for all businesses in its

catchment, particularly garment manufacturing businesses, provided that there continues to be demand for such assistance. Moreover, we have requested that the BID commit to working with our office and the Speaker's office to ensure that we design programs that will prove effective.

The core of the fashion industry has long been Manhattan's Garment Center, and it must remain that way. In speaking with members of the Steering Committee and hundreds of garment manufacturers and employees, it became clear that without the central ecosystem of businesses that exists in the Garment Center, the New York fashion industry is at risk.

After a thorough process that involved extensive engagement and input from stakeholders, we have arrived at a proposal that lifts the old zoning requirements while addressing the needs of the garment industry. We need the EDC programs and the CFDA and BID programs to be successful for the sake of the New York fashion industry and the city as a whole. I urge that in the remaining month of the land use clock: the landlords in the Garment Center step up to participate in the IDA program, all stakeholders work together to ensure the highest likelihood of a successful building acquisition and that the Garment District Alliance commits to working with us on programs to benefit businesses—and especially garment manufacturers—over the next ten years in order to foster the continued health of the garment industry.

Thank you for the opportunity to testify on this important matter.

MANHATTAN COMMUNITY BOARD FIVE

Vikki Barbero, Chair

450 Seventh Avenue, Suite 2109
New York, NY 10123-2199
212.465.0907 f-212.465.1628

Wally Rubin, District Manager

COMMUNITY BOARD FIVE GARMENT DISTRICT TESTIMONY BEFORE THE CITY COUNCIL SUBCOMMITTEE ON ZONING AND FRANCHISES, NOVEMBER 15, 2018

Thank you for the opportunity to comment on the proposed Garment District zoning text amendment.

We've come a long way since this proposal was first announced and we want to thank EDC, DCP, Borough President Gale Brewer and Speaker Corey Johnson for all that they have done to make this proposal a better, more holistic one.

Our goal at Community Board Five has always been to preserve the Garment District and its over 5,000 production jobs and tens of thousands of jobs related to and dependent upon those production jobs. These jobs may not pay an average of \$150,000 a year as in some other industries we deem worthy of billions of dollars of subsidy, but they are perhaps even more crucial to New York's economy and certainly to the laborers, many of them immigrants, who depend upon these jobs to feed and clothe their families.

The Steering Committee that was created to allow all stakeholders a chance to weigh in on this proposed zoning change determined that it was imperative to create a mechanism that would keep a minimum of 500,000 to 700,000 square feet of garment manufacturing space in the district. Without it, the very fabric of the district (pun intended) would unravel and New York would be in danger of losing the entire industry. Maybe this wouldn't happen next year or in five years, but with economic forces in midtown what they are, it was clear that in order to keep the industry in New York, government incentives were necessary (the same situation that applies, apparently, to the tech industry).

We were encouraged this past summer when we learned that it looked as if 300,000 square feet would likely be saved through an incentive program that EDC had devised. In addition, thanks to the encouragement of Speaker Johnson, the administration announced its willingness to put aside \$20 million toward the acquisition of a building devoted solely to garment industry use.

Such a building might preserve an additional 100,000 square feet of space, but more importantly this space would be permanent. We were getting closer to our minimum of 500,000 square feet and remained hopeful.

Unfortunately, just this week we learned that one of the building owners backed out of the IDA incentive program. What looked to be 300,000 square feet was reduced by a third, to only 200,000 square feet of preserved space.

In addition, it appears that, in reality, \$20 million may not be enough to allow for the acquisition of the building, and while a request for an expression of interest has been released, there is still a long road to travel before we get anywhere near the goal of acquiring a building, if we ever do.

It is unacceptable to Community Board Five for this zoning text amendment to pass and for the real estate industry to get what they came to the table for, while the garment industry and the thousands of workers who rely on it are still at such loose ends and utterly unsure of their future. That is far too one-sided a deal.

We implore the Council to come up with some mechanism to ensure that before the current restrictions are removed we have in place at least the minimum 500,000 square feet of garment manufacturing space that is needed to preserve this industry. If not, Community Board Five cannot in good conscience support the passage of this text amendment.

Thank you.



CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD FOUR

330 West 42nd Street, 26th floor New York, NY 10036
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www.nyc.gov/mcb4

BURT LAZARIN
Chair

JESSE R. BODINE
District Manager

Testimony about Special Garment Center Text Amendment
By Jesse Bodine, District Manager
Manhattan Community Board 4
November 15, 2018

Greetings Chair Moya, Speaker Johnson, and members of the Zoning and Franchises Subcommittee. I am Jesse Bodine, the District Manager for Manhattan Community Board 4 (CB4). I am testifying on CB4's long standing advocacy for garment-related manufacturing, residential mixed use development, and the preservation of the built environment in the Special Garment Center District ("The District").

CB4 supports the protections for manufacturing uses in The District. CB4 further strengthened portions of the district by insisting Text Amendments, relating to preserving the mix of residential and manufacturing in The District, were included in the Hudson Yards rezoning in 2005. Unfortunately, besides putting these protections in place, the city has done little to enforce them as you will probably hear many times today as of 2017, 5 million of the 8.5 million square feet in the Preservation Areas are nonconforming uses after having been illegally converted from manufacturing to office space.

In March 2017 the Administration presented a plan to lift the manufacturing preservation requirements in the District and incentivize and facilitate the relocation of the Garment Center to Brooklyn. Neither Community Boards 4, 5, nor a number of the important Garment Center Stakeholders were included in the creation of the plan. There was a strong negative reaction from the Community Boards, the elected officials, and the Garment Center's business associations, unions, and designers, all of which attended our public meetings on the topic. Thanks to Manhattan Borough President Gale A. Brewer the plan was paused and the Garment Center Steering Committee was formed to conduct a true planning process. CB4, along with other state holders, attended bimonthly two hour meetings over the summer of 2017. The Steering Committee's rigorous debate resulted in a number of recommendations.

To the Administrations credit, and with the help of Borough President Brewer and Speaker Johnson, there has been substantial progress in preserving the exist manufacturing space in The District and the acquisition of a new manufacturing building in The District.

However, CB4 cannot support a plan that lifts the protections for garment manufacturing uses in the district now based on future promises. CB4 stands by the recommendations of the Steering Committee that more needs to be done in the way of securing the preservation of existing manufacturing space, more support for the acquisition of a manufacturing building, and the promotion of affordable residential mixed use development.

If we all agree that the Garment Center is a vital and world-class ecosystem of garment-related businesses and preserving a core of garment manufacturing in the Garment Center is a priority then we must secure it now before the protections are lifted.

DESIGN TRUST FOR PUBLIC SPACE

**New York City Council Subcommittee on Zoning and Franchises
Hearing on Garment Center Zoning Text Amendment
CEQR No. 17DCP149M, Manhattan, NY
15 November 2018**

Thank you for the opportunity to submit testimony for the Garment Center Zoning Text Amendment on behalf of the Design Trust for Public Space. Design Trust does not yet have confidence the City will fulfill its commitment to implement a plan to keep garment manufacturing in Manhattan and bolster this creative industry and distinctive neighborhood.

Since 2009 the Design Trust has worked with fashion designers, garment manufacturers, suppliers, property owners, government officials and industry leaders to determine the value and interdependence of this core R&D hub, and unique business cluster that nurtures fashion start-ups and innovation. Its seminal studies, *Made in Midtown* and *Making Midtown* made clear this is the foundation of our city's creative economy and fading manufacturing sector, and if we do not preserve this complex design and prototyping ecosystem, NYC stands to lose--most importantly, our standing as a global fashion capital--a \$98 billion business that employs 180,000 people or 6% of the city's workforce.

The City assured the Garment Center Steering Committee and key stakeholders that lifting of the zoning restriction in P1/P2 would be contingent upon its Plan to secure at least 500,000 square feet of production space.

When Department of City Planning issued its certification for lifting the Zoning Text Amendment, the City assured key stakeholders that 300,000 square feet of garment manufacturing space had been secured through IDA. Now we learn there's only 200,000 square feet.

The most critical part of the Plan is to purchase a building which has not yet advanced. And with the specter of lifting the zoning text amendment in this area, will what's now a \$700 psf property soon sell at \$3,000 psf?

The City and GDA's additional investment of \$14M in the *Fashion Manufacturing Initiative* with CFDA is to be lauded, but the timeframe is vague and must go hand-in-hand with IDA for an entire 10-year period to succeed.

Despite EDC's herculean efforts, basic components of the Plan are not yet in place, so we believe lifting the Zoning Text Amendment at this time will doom the original Plan and further imperil garment manufacturing.

The City Council can make this Plan a reality by:

- Delaying approval of the text amendment until the components that will preserve the District are in place

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- Providing additional City capital funding, and seeking State and Federal to support for a building purchase
- Continuing to push the IDA tax incentive program
- Ensuring that the FMI program is in place for a 10-year period, and
- Continuing to work with the Steering Committee to significantly advance this entire Plan

New York City depends on creative work and the web of industries and suppliers to be a global leader. This is our last opportunity to save the fashion industry as part of our portfolio, and the economic engine that helped build New York. We urge you to not only to retain a core of the Garment Center, but to invest in it before its lost forever.



TESTIMONY

New York City Council Subcommittee on Zoning & Franchises

by

Virginia P. Louloudes, Executive Director
Alliance of Resident Theatres/New York (A.R.T./New York)

November 15, 2018

City Hall

Good morning. My name is Ginny Louloudes and I am the Executive Director of the Alliance of Resident Theatres/New York, the service and advocacy organization for New York City's 400+ nonprofit theatres. I want to thank the City Council Subcommittee on Zoning and Franchise for allowing me to testify at this hearing.

Founded in 1972, A.R.T./New York assists our member theatres in managing their theatre companies effectively so they may realize their rich artistic visions and serve their diverse audiences well. Over the years we have earned a reputation as a leader in providing progressive services to our members – from shared office, rehearsal, and performance space to the nation's only revolving loan fund for real estate, to technical assistance programs for emerging theatres – which have made our organization an expert in the needs of the New York City nonprofit community.

A.R.T./New York supports the initiatives set forth by the Mayor's Office of City Planning and the Office of Economic Development to remove the preservation restrictions in the Garment District and replace it with Programs to directly help garment manufacturers.

Like New York City's garment manufacturers, New York City's nonprofit theatres have struggled for years to find affordable office, rehearsal and performance space. The Off Off Broadway movement, which had its origins in the East and West Villages, has travelled to Soho, Hell's Kitchen, the Lower East Side, Tribeca and now, Brooklyn and Queens. Those of us, who are fortunate, found homes in the Garment District in the late 1990's. In 2001 A.R.T./New York signed a 20-year lease with Gural Family Properties to transform 36,000 square feet of space at 520 Eighth Avenue into 20 offices for our member companies as well as seven rehearsal studios. The neighborhood was quite different than it is today. Side streets were dark; and some parts of Eighth Avenue were safer than others.

Despite these small inconveniences we loved the area, which was not only adjacent to Broadway but blocks away from Penn Station and Port Authority as well as dozens of subway lines. We quickly attracted 20 companies to rent offices

from us and our rehearsal studios have done a brisk business seven days a week, from 9 am to 10 pm!

Over the years other arts organizations have joined us: the administrative offices of the Roundabout Theater Company; and in our own building dozens of nonprofits including Theater Communications Group and the Theater Development Fund! We even have performance spaces such as the Barrow Group Theater and the Chain Theater. All of us have come to call the Garment District our home. We cannot think of a better neighborhood in which to call home.

We also believe that the Garment District should maintain a presence in this neighborhood. The Fashion industry is a key employer in the area not to mention one of the unique industries that make New York City the Big Apple. By providing financial incentives to landlords to maintain garment manufacturing in their buildings, the Office of City Planning and Economic Development have made a commitment to ensuring that manufacturers can afford to work here. As a nonprofit theatre professional, I know first-hand what it is like to seek an affordable office space. Hundreds of my members worry that when their leases for their offices, rehearsal studios or performance spaces expire, they will be forced to move due to rising rents.

Please support these incentives and help ensure the future of the garment manufacturing industry in New York City.

The Movement To Protect The People and Flower Lovers Advocating for Communities

Att.: Daniel Whitehead, Chief Administrator,
New York Department of Environmental Conservation
625 Broadway, Albany N.Y. 12233

August 7, 2018

Re: Cornell Realty Hearing Comments – **Objections to Negative Declaration**
CEQR # 17DCPO67K
ULURP# 180347ZMK and N180348ZRK

We are filing a formal complaint against the New York City Department of City Planning in regards to their negative declaration on the Cornell Realty Application sited above. Below are the facts pertaining to this case.

Pursuant to the Section 5-07 of the Rules of Procedure of Environmental Review (CEQR) and 6 NYCRR 617.8 (State Environmental Quality Review), the New York City Department of City Planning (DCP), acting on behalf of the City Planning Commission (CPC) as CEQR lead agency, has determined that an Environmental Impact Analysis is not warranted for the Cornell Realty development.

The Cornell Realty Management LLC is seeking two discretionary actions in order to facilitate the redevelopment of two sites in the Crown Heights neighborhood of Brooklyn in Community Board 9 along the perimeter of the Brooklyn Botanic Garden.

1. A zoning map amendment in Section 16d of the Zoning Map to rezone portions of Blocks 1188, 1189 and 1190, including two Applicant-owned projected development sites from R6A, R6A with C1-E overlay and R8A zoning districts to an R8x district and R8x with C2-4-overlay.
2. A zoning text amendment to appendix F of the Zoning Resolution (ZR) to designate the northern and southern block ends of the Project Area as a Mandatory Inclusionary Housing (MIH).

In 1991, after a major renovation project was completed at the Brooklyn Botanic Garden (BBG) which included three conservatories and redesign of their green houses, the Department of City Planning “DCP” sited three “soft sites” in which height limits were created. During the rezoning process the DCP declared that any structure above 13 plus stories would cause damage to the Brooklyn Botanic Garden due to shadows on these light sensitive structures and the plant life.

The Movement To Protect the People and Flower Lovers Against Corruption are groups of local leaders organizing and inspiring residents in the Crown Height/Flatbush Ave community and the surrounding communities to challenge the main issues directly and adversely impacting the current and future preservation of the Brooklyn Botanic Garden, residents homes, apartments, businesses, community organizations, clinics, senior centers, schools, published services and overall quality of life.

MTOPP and FLAC consider The Department of City Planning determination for Cornell Realty not to conduct an environmental impact statement, a violation of the SEQRA provision of the state law. It is viewed as a continuation of the racist policies of the Department of City Planning to allow negative environmental consequences to occur in low to moderate income communities of color,

whereas the more affluent white middle class communities are afforded the opportunity to be kept informed and to mitigate negative environmental impacts in their neighborhoods.

MTOPP and FLAC considers the Negative Declaration that was approved by the Department of city deficient in several key areas and provides the following comments regarding the demand for a full Environmental Impact Analysis to be performed.

**Comments on Negative Declaration and Environmental Assessment Statement
Cornell Realty Environmental Assessment Statement (CEQR No 17DCPO67K)
“Cornell Realty EAS”**

Pursuant to Sections 5.03 and 5.05 of the City Environmental Quality Review Rules of Procedure, the (DCP), acting on behalf of the City Planning Commission (CPC), is assuming Lead Agency status for an application submitted by Cornell Realty to construct three luxury mega towers of 175ft (excluding the bulkhead and FRESH additional heights) residences along the eastern border of the Brooklyn Botanic Garden in a 60/70 height limited zone.

Conformance of Law

The evaluation of potential environmental “impacts” included public identification, disclosure, and analysis of any aspect of the proposed project(s) subject to laws other than SEQRA, especially those that extend beyond the impact category and represent potential for violations of or compliance interference with laws, regulation, Order on Consent, Administrative Orders, or any other enforcement action issued by Federal, State, or municipal authorities covering the operation and management area of the project(s). In the case of Cornell Realty rezoning, these include (but are not limited to) the Clean Water Act, the Clean Air Act, the Comprehensive Environmental Response Compensation and Liability Act, and the Federal Emergency Response Act.

Shadows

Cornell proposed developments will create shadows that will have a significant detrimental impact on the surrounding areas, especially in regards to the Brooklyn Botanic Garden. The shadow study produced by Cornell Realty and approved by DCP is fraught with inconsistencies and a complete failure to abide by procedural standards to determine the negative shadow impact.

Determining Whether a Shadow Assessment is Required

CEQR Chapter 8 section 200 –

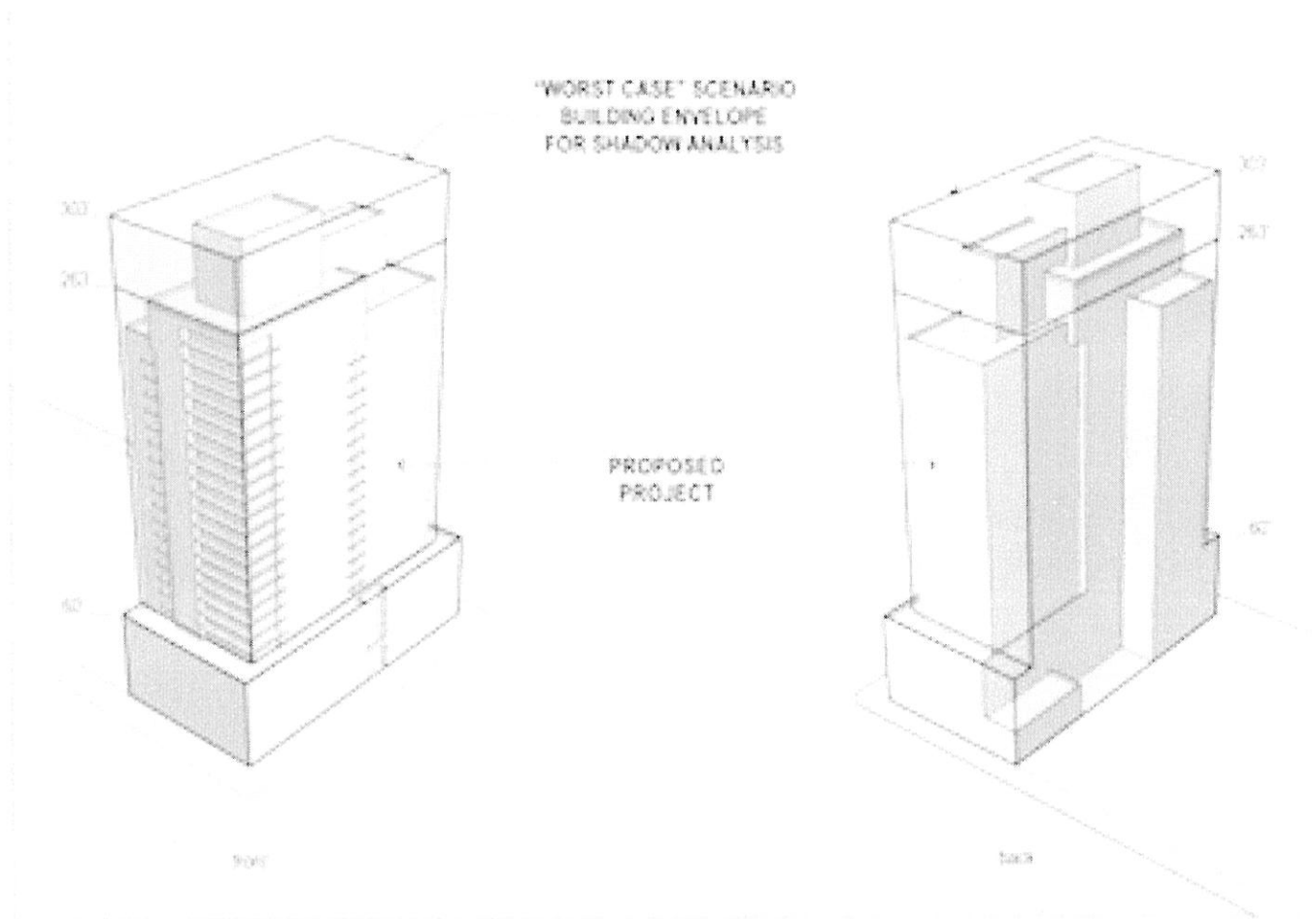
The shadow assessment considers project that result in new shadows long enough to reach a sunlight-sensitive resource. Therefore, a shadow assessment is required only if the project either (a) results in a new structure (or additions to existing structures including the addition of rooftop mechanical equipment) of 50 ft. or more or (b) be located adjacent to or across the street from, a sunlight-sensitive resource.

In order for a determination to be made about the height and bulk of the building to be used in a shadow study determination CEQR had defined the requirement to perform the assessment phases using the “worst case” scenario model.

Determining the “worst case: scenario for shadows.

CEQR Chapter 8 Section 314.2 –

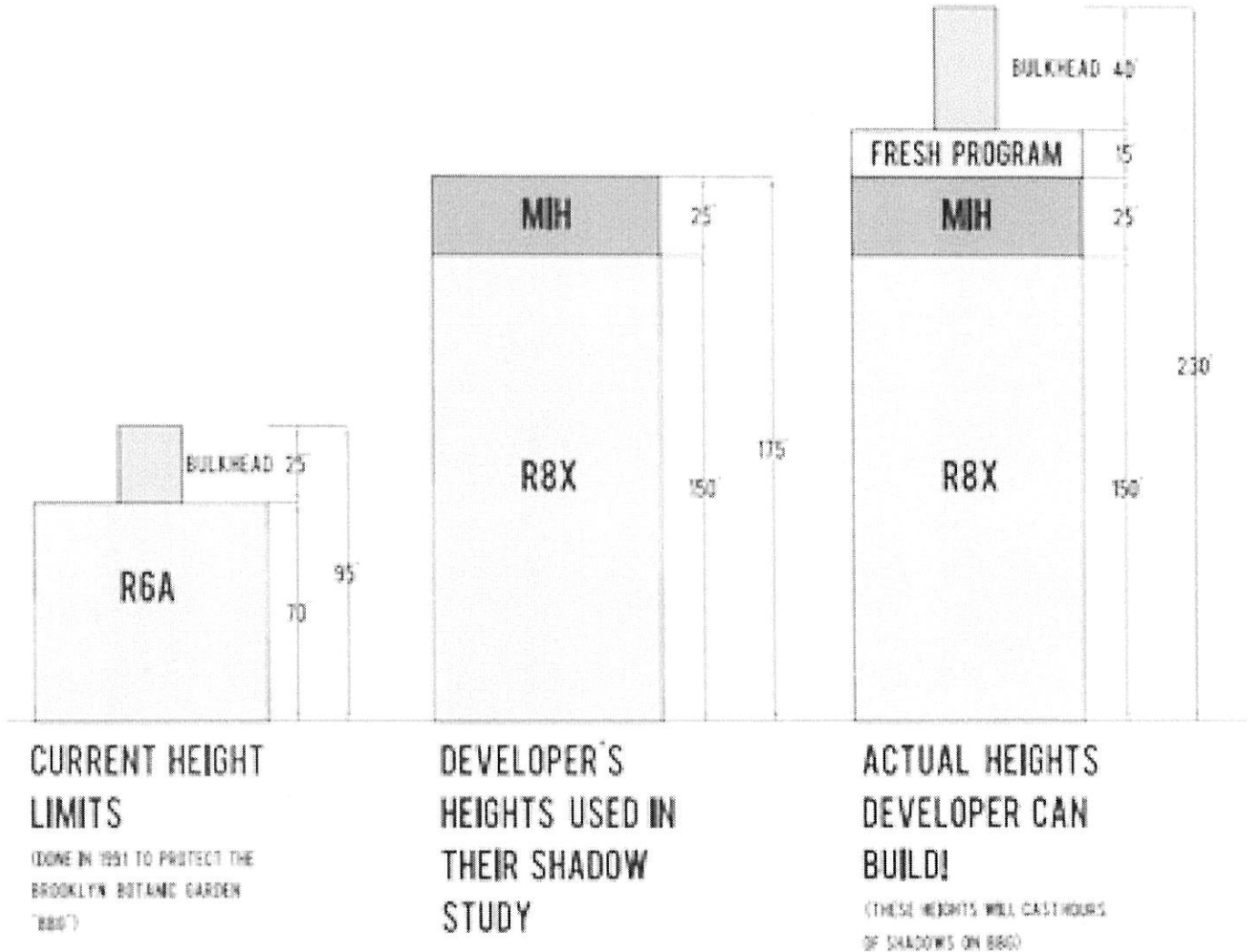
FIGURE 8-5 - EXAMPLE OF “WORST CASE” SCENARIO BUILDING ENVELOPE



The three-dimensional model of the proposed project must depict a “worst case” scenario for shadows from the building resulting from the proposed project. Since the allowable building envelope generally allows for multiple configurations of a building with the same floor area, a “worst case” scenario is constructed for a shadows assessment that combines the worst possible features, in terms of casting shadows, of all possible configurations. This eliminates the need for multiple analyses and would allow for the eventual selection among these possible configurations. This “worst case” scenario is illustrated in Figure 8-5. If the proposed project includes special permits or similar actions that relate to the building envelope, the “worst case” should include such allowances or restrictions on the building form. The building envelope depicting the worst case scenario must include the maximum allowed floor area, all rooftop mechanical equipment, parapets and any other parts of the building.

Determining Cornell Realty Worst Case Scenario model

In Cornell Realty application sited above there are three proposed buildings to be built at 175 ft. each. Additionally, Cornell requested within their application the FRESH program (special



permit) their development. Thus the worst case scenario should include the maximum allowable allowance for a building of 175 ft., the bulkhead and the FRESH program.

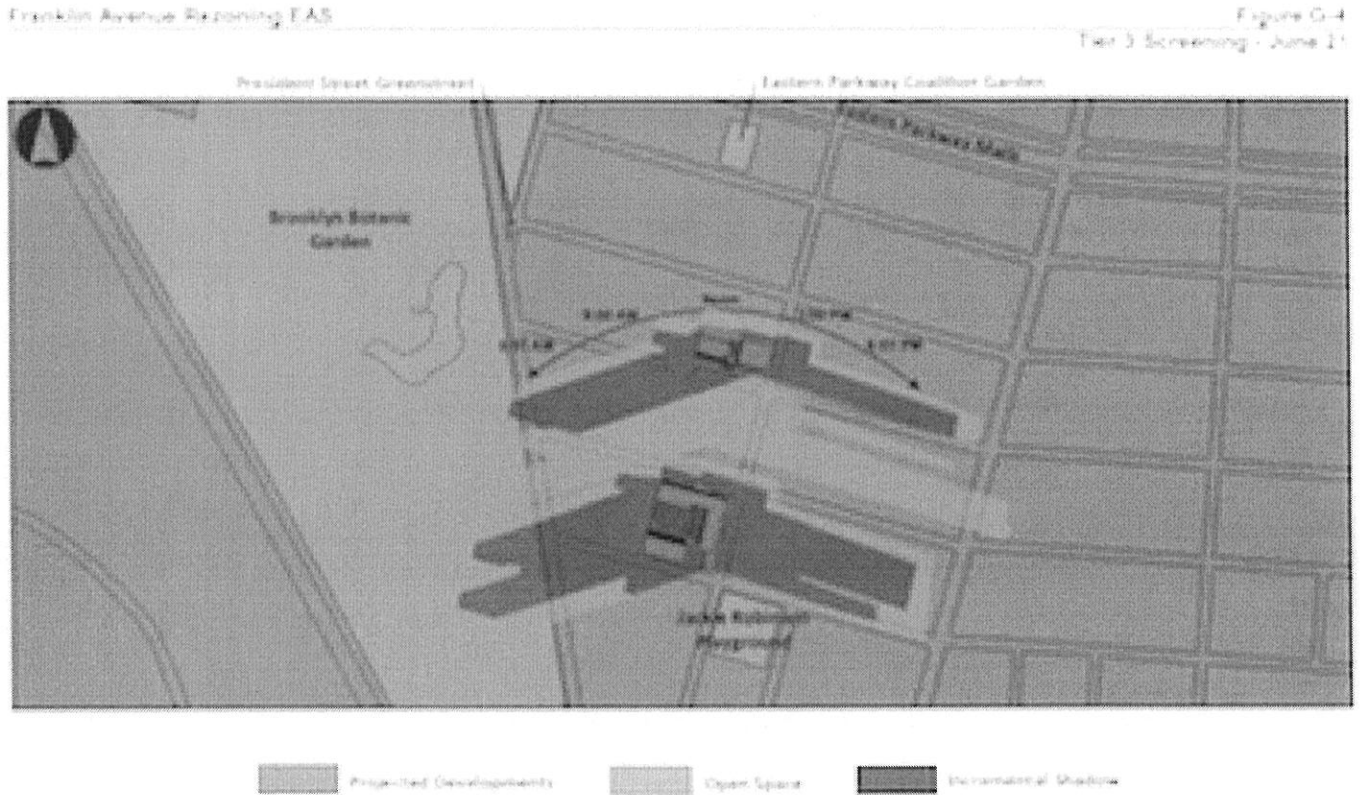
The NYC Zoning Text section 24-51 defines the Bulkheads and their height allowances. "Permitted Obstructions (f) Elevator and stair bulkheads..(3) (ii)...Where the maximum permitted height of a #building# is 120 feet or greater, such obstruction are limited to a maximum height of 40 ft."

In the Zoning Text Section Chapter 3 FRESH program it states in section 63-02 that Community Board 9 in Brooklyn has the FRESH Program.

In Section 63-22 of the same publication it allows developers to increase their building heights. "Authorization to Modify Maximum Building Height "authorizes modifications...to allow the applicable maximum building height to be increased by 15 ft." Additionally, the application may be applied for after a Building Permit has been issued and must accompany a "signed lease from the prospective of the operator of the #FRESH food store".

DCP stated at the Cornell Realty presentation on June 12 at the ULURP committee meeting in that Cornell Realty only used 190 ft. for their shadow study assessment. This included a 15 ft. bulkhead and did not include the FRESH program, despite Cornell Realty stating in their application of their intention to apply for this program (they can apply for the program after a building permit is issued).

Evaluation of Cornell Realty Shadow Assessment

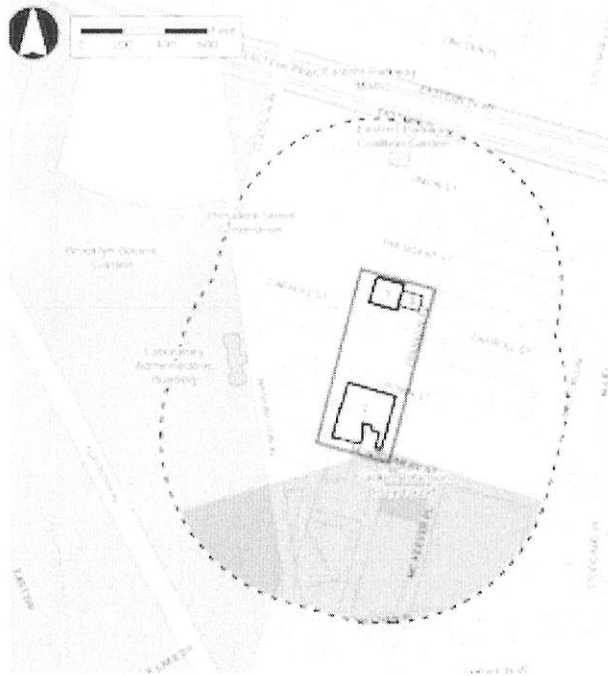


In the above diagram is an overlay rendition of Cornell Realty Shadow study. Cornell Realty in their model did not depict the actual size of their renditions, thus this overlay was done to determine exactly what size was used.

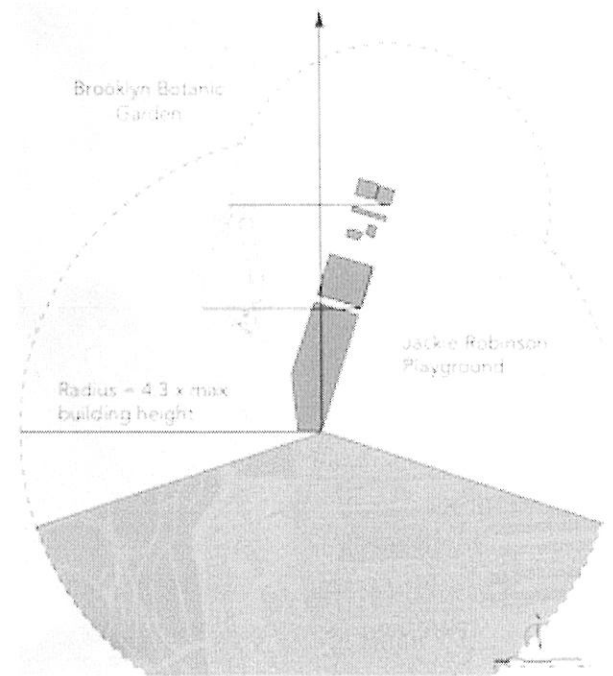
In the small gray area is Cornell Realty shadow depiction at 175ft., in the outer lay is 190ft. in red. Thus, it is clear that Cornell Realty used the 175 ft. size of the building and not the 190ft. as reported by DCP.

TIER 1 AND 2 ANALYSIS

CORNELL REALTY
 Building height: 175 feet



SCALAR/TERREFORM
 Building height: 235 feet + 441 feet



This is a comparison of Cornell Realty shadow study assessment in which they used 175ft for their assessment vs. the “worst case” scenario renditions which clearly show negative impact on the Brooklyn Botanic Garden.

Site 2: Cornell Realty Management

Brooklyn Botanical Garden

Shadow enter	7:36:00 AM	5:57:00 AM	6:27:00 AM	7:36:00 AM	8:51:00 AM
Shadow exit	8:10:00 AM	7:20:00 AM	7:42:00 AM	8:10:00 AM	9:15:00 AM
Incremental shadow duration	0:34	1:23	1:15	0:34	0:24
In minutes	34	83	75	34	24
Percentage	6%	14%	10%	6%	7%

Jackie Robinson Playground - No incremental shadows from proposed Site 2 development

Prepared by Scalar Architecture and Terreform Center for Advanced Urban Research for Movement to Protect the People
 As of 6/26/2018
 info@scalararchitecture.com / andrea@terreform.info

According to Cornell Realty shadow study findings the shadows will only hit the garden for a maximum of five minutes, however, using the worst case scenario that number rises drastically, from 5 minutes to in total 251 minutes.

Two independent shadow studies were performed by Scalar Architecture - Terrefrom Center for Advanced Urban Research and Pratt University School of Architecture, both determined that the shadows cast by Cornell Realty would cause negative environmental impacts to the Brooklyn Botanic Garden.

Case law abounds regarding the requirement for Environmental Assessment statements to be done accurately to determine if an Environmental Impact Statement should be done. In this case it is not only clear that Cornell Realty did not use the proper procedural guidelines to determine if any negative impact would occur but in fact didn't even use the 15ft. bulkhead in their renditions that the DCP made the claim that they did.

Water and And Sewer Infrastructure

Cornell Realty Lies on Environmental Assessment Statement Application

According to the CEQR Technical Manual, a water and sewer infrastructure assessment analyzes whether a proposed project may adversely affect New York City's water Distribution or sewer system and, if so, assess the effects of such projects to determine whether their impact is significant, and present potential mitigation strategies and alternatives.

In Cornell Realty application they did not do the initial analysis of the Water and Waste Sewer Infrastructure despite the requirement to do so. On the Cornell Realty EAS application where it states Water and Sewer Infrastructure (b) *if the proposed project located in a combined sewage area, would it result in at least 400 residential units or 150,000 square feet or more of commercial space in the Bronx, Brooklyn, Staten Island or Queens?*

10. WATER AND SEWER INFRASTRUCTURE: CEQR Technical Manual Chapter 13		
(a) Would the project result in water demands of more than one million gallons per day?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) If the proposed project located in a combined sewer area, would it result in at least 1,000 residential units or 250,000 square feet or more of commercial space in Manhattan, or at least 400 residential units or 150,000 square feet or more of commercial space in the Bronx, Brooklyn, Staten Island, or Queens?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c) If the proposed project located in a separately sewered area, would it result in the same or greater development than the amounts listed in Table 13.1 in Chapter 13?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d) Would the proposed project involve development on a site that is 5 acres or larger where the amount of impervious surface would increase?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Cornell stated NO! However, this is not true, according to Cornell Realty's application a combined total of **565 residential units** will be created from their project. They lied because if it does then they will have to do an Infrastructure analysis of the project.

Establishing Cornell Realty Legal Requirement to do Water and Sewage Infrastructure Analysis

CEQR Chapter 13 Infrastructure

"Generally, only projects that increase density or change drainage conditions on a large site require infrastructure analysis. In addition to waster supply, conveyance and waste water treatment (WWTP) assessments, stormwater management is an integral component of an infrastructure analysis due to potential environmental impacts related to how much the built

sewer and conveyance system can handle, and related effects such as street flooding, surcharging sewers downstream, sewer back-ups (SBUs), increases in CSOs, and pollutant loadings contained in CSOs or direct stormwater discharges to the City's surrounding water bodies. Stormwater drainage is also a central element of the natural resources analysis described in Chapter 11, "Natural Resources" since stormwater is a substantial contributor of water into natural system such as wetlands and adjacent water bodies. Disruption of water and sewer services during construction should be addressed in Chapter 22, "Construction".

Establishing Cornell Realty Location – A Combined Sewage system

CEQR Chapter 13, 121.1 Combined Sewer Systems

About 50 percent of the City's land area is served by a combined sewer system in which the system collects both "dry-weather" wastewater (primarily sanitary sewage as well as wastewater from industries and stormwater). During dry weather, combined sewers function as sanitary sewers, conveying all flows to the WWTP (Newtown Creek Waste Water Treatment) for treatment. During wet weather, however, large volumes of rainfall runoff can enter the system from building connections and through catch basin along the City's streets. If this water were conveyed to the treatment plants, it would exceed their design capacity.

Areas served by "separate sewers include certain areas of Queens and Staten Island. Thus Brooklyn is served by a combined Sewage System.

CEQR Chapter 13 121.3. states: Stormwater is of concern if it exceeds the capacity of the City's sewers or wastewater conveyance systems and transmits new or increased levels of pollutants in the City's water bodies. This is an issue for developments that would increase residential density....

Chapter 13 Section 200 Determining Whether an Infrastructure Assessment is Appropriate 220 Waste and Stormwater Conveyance and Treatment.

The thresholds below related to a project's potential to result in a significant adverse impact to the environment. A preliminary infrastructure analysis would be needed if the project: Is located in a combined sewer area and would exceed the following incremental development of residential units or commercial, public facility or institution and/or community facility space above the predicted No-Action scenario:

400 residential units or 150, square ft. of commercial, public facility and institution and/or community facility space or more in the Bronx, Brooklyn...

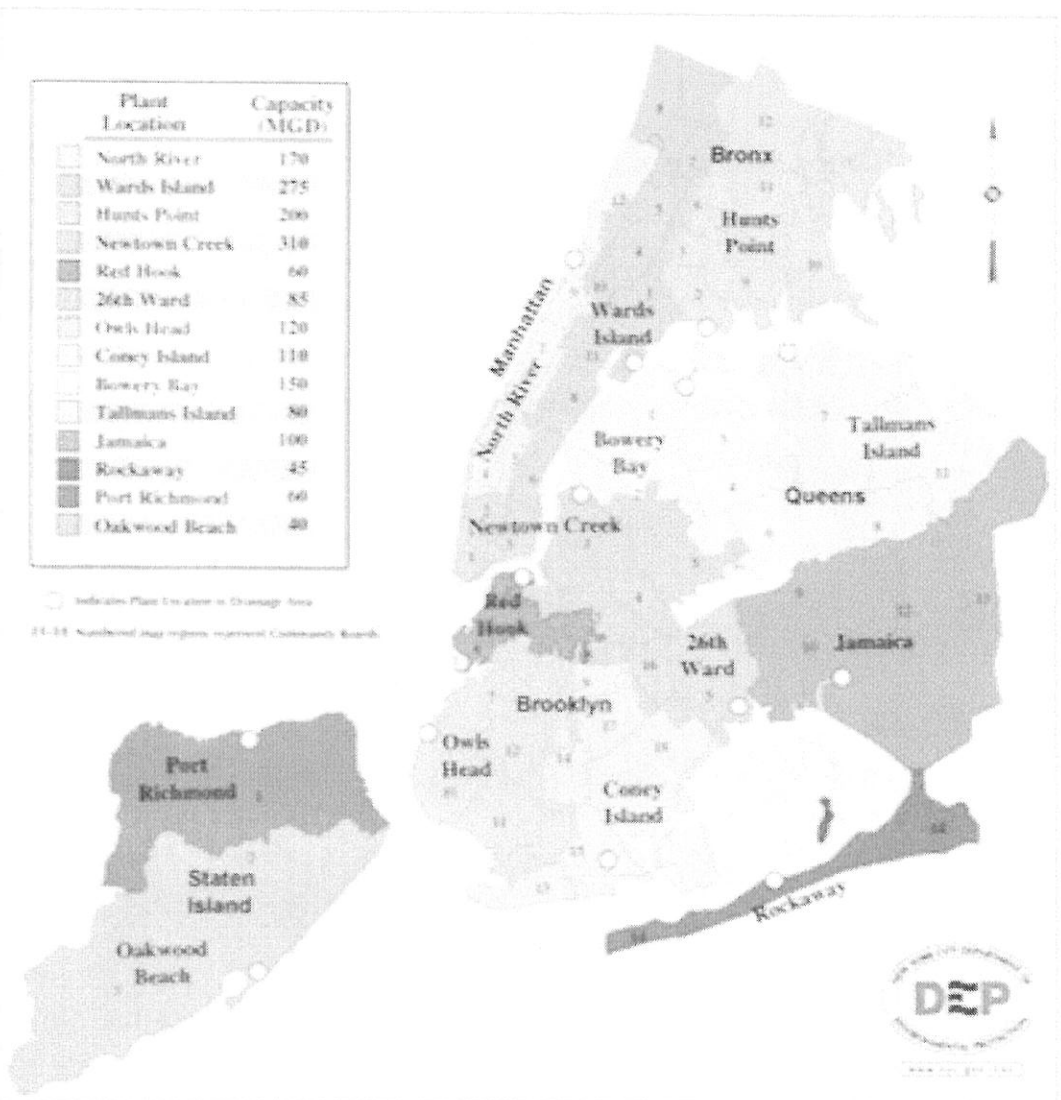
Cornell Realty application states their development will produce a total of 518 residential units, and 16,284 square ft. of local retail. The other proposed development within the rezoning area, will produce 54,000 square ft. of 47 residential units, and 7,500 gsf of local retail space. Thus the total is 565 residential units and 23,784 gsf of retail and 165 parking. These number clearly exceed the require threshold to demand an Infrastructure Assessment.

The Importance of a Sewage Analyses to be preformed by Cornell Realty.

When it rains in New York City, raw sewage bypasses treatment plants and flows directly into city waterways. Even a relatively small amount of storm water—one twentieth of an inch of rainfall—

can overwhelm aging and clogged system components and trigger the Combined Sewer Overflow (CSO) system. The New York State Department of Environmental Conservation (DEC) has identified Combined Sewer Overflows (CSOs) as the single largest source of pathogens to the New York Harbor system, due to their contribution of fecal coliform. Besides the human waste, any oil, industrial waste or household garbage that happens to be on the street when a rainstorm begins are swept by the flowing street water into the CSO system as well. The toxic soup flows untreated out of pipes that feed directly into the waterways.

The New York State Department of Environmental Conservation administers the State Pollutant Discharge Elimination System ("SPDES") permit program (ECL §17-0801, et seq.) to which New York City is jurisdictionally subject. New York City operates under multiple SPDES permits for its wastewater treatment plants, and for its Municipal Separate Storm Sewer Systems (MS4). In general, the SPDES program prohibits any discharge of pollutants to the waters of the State without a permit establishing pollutant limitations and treatment requirements.



Thus, SPDES

permits set certain effluent limitation parameters, determined according to ECL §17-0809 and 6 NYCRR Part 750-1.11, in order to avoid contravention of mandated federal water pollution control requirements and water quality standards ("WQS"). Those conditions address not only the allowable parameters for discharge of pollutants to waters of the State, but also the manner in which the permittee is to operate, maintain, monitor and report on its regulated facilities and activities.

The proposed Cornell development will be located in the drainage area that feeds to the Coney Island Wastewater Treatment Plant (CIWTP) (see map above). The Combined sewage and rainwater of Bedford Union Armory, and all of the new development that has accrued in the past ten years in the area of Brooklyn covered by this plane, will increase the pressure and stress on the CIWTP.

Major zoning changes and large scale development continues unabated throughout the CIWTP basin. The addition of Cornell Realty developments in an already dense area with a high volume of, education and healthcare facilities, as well as residences affects the capacity and flow control of the entire CIWTP drainage system and adds to the likelihood of continued CSOs.

Cornell Realty must assess the full impacts to pipe and plant loading, as well as the adverse impacts from ongoing CSO overflow to the public waters. This however can not be done unless Cornell first does the initial analysis required in the Environmental Assessment statement.

Socioeconomic Conditions

“The socioeconomic character of an area includes its population, housing, and economic activity. Socioeconomic changes may occur when a project directly or indirectly changes any of these elements. Although socioeconomic changes may not result in impacts under CEQR, they are disclosed if they would affect land use patterns, low-income populations, the availability of goods and services, or economic investment in a way that changes the socioeconomic character of the area.”

However, because this proposed construction affects a Large Scale Residential Development Zoning Area, the assessment is not limited to the categories outlined in the CEQR Technical manual, but must also evaluate outcomes and long term effects under the standards set forth in Section 78-01 of the Zoning Resolution of the City of New York which states:

For large-scale residential developments involving several zoning lots but planned as a unit, the district regulations may impose unnecessary rigidities and thereby prevent achievement of the best possible site plan within the overall density and bulk controls. For such developments, the regulations of this Chapter are designed to allow greater

flexibility for the purpose of securing better site planning for development of vacant land and to provide incentives toward that end while safeguarding the present or future use and development of surrounding areas and, specifically, to achieve more efficient use of increasingly scarce land within the framework of the overall bulk controls, to enable open space in large-scale residential developments to be arranged in such a way as best to serve active and passive recreation needs of the residents, to protect and preserve scenic assets and natural features such as trees, streams and topographic features, to foster a more stable community by providing for a population of balanced family sizes, to encourage harmonious designs incorporating a variety of building types and variations in the siting of buildings, and thus to promote and protect public health, safety and general welfare.

Cornell Realty project is being propose in a low income community, in which the proposed population will increase by over 5%, and rental properties will be way over the top portion of the community. Even the “affordable” categories will far surpass the community’s average medium income which is \$40,000 compared to the average medium income of \$104,000 for affordable units.

Segmentation

According to State Law Section 617.2(ag)

Segmentation is defined as the division of the environmental review of an action so that various activities or stages are addressed as though they were independent, unrelated activities needing individual determinations of significance. Except in special circumstances, considering only a part, or segment, of an overall action is contrary to the intent of SEQR.

There are two types of situations where segmentation typically occurs. One is where a project sponsor attempts to avoid a thorough environmental review (often an EIS) of a whole action by splitting into two or more smaller projects. The second is where the activities that may be occurring at different times or places are excluded from the scope of the environmental review. By excluding subsequent phases or associated project components from the environmental review, the project may appear more acceptable to the reviewing agencies and the public.

Proposals or parts of proposals that are related to each other closely enough to be, in effect, a single course of action should be evaluated as one whole action.

The Department of City Planning determined that the proposed Franklin Avenue Rezoning would not have a significant effect on the environment, in spite of the fact that within the zoned area, certain plots of land that will be rezoned were not considered in the Cornell Realty analysis. Block 1188, Lots 53, 54, 55, not owned by Cornell Realty management, is a part of the proposed action, and yet development in the future after the area is rezoned may occur. This affected area is not depicted within the overall analysis performed by Cornell Realty in all categories of the EAS.

Department of City Planning indicated in their supporting statement that: “*Changes to the application include: the elimination of the portion of Block 1189 from the proposed zoning text amendment...*” However, it is stated on page 1 of the Revised Negative Declaration, “*A zoning map amendment to rezone portions of Blocks 1188, 1189, and 1190 from R6A, R6A/C1-3 and R8A zoning districts to R8X and R8X/C2-4...*” This declaration contradicts the supporting statement. Block 1189 should not have been eliminated in Cornell Realty analysis. In fact, all blocks and lots that are subject to the rezoning should be included in the analysis, to ensure that segmentation of the project does not occur.

Not only did DCP not consider blocks and lots within the proposed rezoning plan when Cornell Realty did their analysis and they certified the application, but they did not take into account the Franklin Avenue acquisition proposal submitted by Continuum LLC. This proposal asks for a rezoning of Block 1192, just south and adjacent to Block 1190, changing the zoning from R6A to R9X/C2-4. These two applications should be evaluated as one whole action.

Additionally, Cornell Realty just sold one portion of their land to another developer in an attempt to further segment this project and to also address their out right lie on the EAS short form of the City Of New York, when they stated their project would create less than 400 residential units, when in fact it will currently according to their application generate 565 residential units.

Cumulative Effects.

Both plots of land of Cornell Realty and Continuums’, proposed developments were treated as one continuous land mass, in 1991, when the City of New York put forth a zoning plan to protect BBG and passed the zoning height limits into law. DCP labeled these plots of land as “Soft Sites, A, B, and C”. They rezoned this entire portion together and conducted a shadow study and other analyses to justify the height limits that were imposed.

Now all three of these sites have developments being proposed all of the same nature (creation of residential units and extension of commercial space), using all of the same resources (i.e. water and sewage), all adjacent to each other and all having an impact upon the existing community and BBG.

Additionally, despite the fact that the current zoning is residential, all three of these current plots of land have been used as low rise commercial enterprises, thus the overall usage of the entire area would be drastically altered from a low rise commercial area to large residential complexes. Including the addition over 2,200 residential units.

These cumulative effects were not considered despite the clear directive of the SEQR law to consider all past, present and future projects which can be reasonable foreseeable in the future.

The Higher Courts Determination on Negative Declarations.

There is a body of law from the higher courts of negative declaration being declared null and void because of applicants’ failure to conduct proper EASs.

In the matter of Village of Chestnut Ridge v. Town of Ramapo, 99 A.D. 3d 918, a **negative declaration** adopted without reference to any empirical or experimental data, scientific authorities, or any explanatory information, and consisting of conclusory statements may be annulled, and strict compliance with the procedural requirements of the State Environmental Quality Review Act

(SEQRA), ECL art. 8, is mandated..” (emphasis added)

In the matter of Kahn v. Panik, 90 N.Y. 2d 256 stated A court's authority to examine a State Environmental Quality Review Act (SEQRA) review conducted by an entity that is required to do so is limited to reviewing whether the determination is made in violation of lawful procedure, is affected by an error of law, or is arbitrary and capricious or an abuse of discretion. The relevant question before the reviewing court is whether the agency identified the relevant areas of environmental concern, took a "hard look" at them, and made a "reasoned elaboration" of the basis for its determination.

In the matter of Merson v. McNally, 90 N.Y. 2d 742 regarding the State Environmental Quality Review Act's (SEQRA), 6 N.Y. C.R.R. § 617 et seq., speaks closest to the issues being presented in regards to Cornell Realty's negative declaration.

In the Cornell case, the lead applicant DCP, engaged in a private agreement to mitigate the negative impacts of a proposed project which then resulted in a negative declaration; the reduction of the allowable allowance of bulkheads from 40 ft. to 15 ft. for a project that is over 100 ft.

The courts however created a twofold inquiry to assess these agreements.

The court prescribes a twofold inquiry to examine whether a negative declaration has been impermissibly conditioned: (1) whether the project, as initially proposed, might result in the identification of one or more significant adverse environmental effects; and (2) whether the proposed mitigating measures incorporated into the Environmental Assessment Form were identified and required by the lead agency as a condition precedent to the issuance of the negative declaration.

..where the lead agency has identified potentially significant impacts, or where the record supports an inference that the identified impacts would have to be considered potentially significant, or where the identified impacts fall within typically environmentally sensitive areas or locations, the second prong of the test must be examined

At the second phase of analysis of the twofold inquiry to examine whether a negative declaration has been impermissibly conditioned, a court must examine whether the proposed mitigating measures, incorporated as part of an open and deliberative process, negated the project's potential adverse effects.

In the Case of Cornell Realty, the lead agency DCP already has sited, in their previous determination to place height limits on the area that is now being considered for upzoning which included a statement on the record that any building being built above 13 plus stories would be detrimental to BBG, due to the shadows cast on garden. Thus the first inquiry has been met, in this case DCP has identified a significant negative effects, for buildings over 13 stories height.

During the presentation of the Cornell Realty application at Community Board ULURP committee meeting, when the issue of how Cornell Realty came up with their parameters for the shadow study, Cornell Realty stated that DCP had advised them regarding the 15ft bulkhead

dimensions.

Thus it is clear that the reduction of the bulkhead requirement from 40ft to 15 ft. was not done in an open and deliberative process, nor was it ever discussed as a lawfully binding condition to mitigate the negative impacts on the garden. It was used to hide and deceive the public and to allow the lead agency DCP to declare a negative declaration.

Finally, the courts summarized their position regarding behind the door negotiations with developers.

The State Environmental Quality Review Act's (SEQRA), 6 N.Y. C.R.R. § 617 et seq., fundamental policy is to inject environmental considerations directly into governmental decision making. This policy is effectuated, in part, through strict compliance with the review procedures outlined in the environmental laws and regulations. A SEQRA review process conducted through closed bilateral negotiations between an agency and a developer would bypass, if not eliminate, the comprehensive, open weighing of environmentally compatible alternatives both to the proposed action and to any suggested mitigation measures. (Merson v. McNally, 90 N.Y. 2d 742, 1997)

Conclusion

It is clear that a proper EAS has not been performed by the Cornell Realty and thus the need for them to redo their EAS and to have a EIS done to ensure that all negative environmental effects are disclosed and mitigated to protect the community, the people and the public resources.

Sincerely,

Alicia Boyd, MTOPP

Cc: Senator Kevin Parker
 Senator Jesse Hamilton
 Borough President Eric Adams
 Assemblyman Walter Mosely
 Congresswoman Evette Clark
 Councilwoman Laurie Cumbo
 Robert Dobrushkin, Chair of City Planning Commission
 Winston R. Von Engel, Director of City Planning Brooklyn
 Hillary Semel, Director Mayor's Office of Environmental Coordination
 Pat Baker, Chairperson of Community Board 9



Marcus Garvey Extension

**Affordable Housing & an Active
Livonia Corridor in Brownsville**

L+M DEVELOPMENT PARTNERS
11.15.2018

Marcus Garvey Apartments Rehabilitation (2014-2016)



- 625-unit, 8-block complex
- Completed large-scale rehab scope of work in 2016
- Occurrence of reported criminal activity significantly reduced since property acquisition
- Fully occupied with 1-year plus waitlist, 2,000+
- Mitchell Lama/LIHTC AMI is 60% AMI and below
- Exceeded goals for local hires on construction
- Engaged residents with activities, and supported reinstatement of Family Day



L+M Programs and Initiatives at Marcus Garvey Apartments were guided by Resident Surveys and Community Conversations



Greenhouse on Chester Street

Guided by resident needs survey we:

- Provided space for urban farm and neighborhood farm events in response to desire to lead healthier lives
- Initiated afterschool and Summer Camp at MGA Community Room for youth recreational activities
- Facilitated creation of youth clubhouse and youth programming to address gang violence and alternatives to incarceration and promote positive youth development and leadership
- Actively supported resident activities such as Marcus Garvey Family Day and Holiday Party and Toy Give-Away to foster community environment
- Workforce development trainings and jobs in response to resident job creation during renovation
- Provided technical assistance and meeting space to local community groups in the Brownsville area to promote public/private relationships



Marcus Garvey Extension Program



ULURP Actions for Large Scale Development Plan will Facilitate an Active Brownsville Community

- Zoning map amendment to change portions of the existing R6 to R7-2 districts and R7-2/C2-4 districts – **ALLOW RETAIL ALONG LIVONIA**
- Zoning text amendment: Establish the Project Area as a Mandatory Inclusionary Housing (“MIH”) Area – **ENSURE AFFORDABILITY**
- Special permit to blend lot coverage requirements throughout the seven project sites – **OPEN SPACE AND GREEN SPACE**
- Special permit to waive existing Marcus Garvey parking requirement
- Swap existing GreenThumb garden with Applicant-owned site that is twice the size of existing garden – **INCREASE GREEN SPACE**
- Acquisition of HPD vacant lot adjacent to Site E – **INCORPORATE ADDITIONAL AFFORDABLE UNITS**



MGA + MGX Site Plan





Benefits for Brownsville



Brownsville residents expect to gain:

- Maximized **affordable housing** opportunities for area residents
- Ground floor **retail & community facilities**
- **Jobs** in both construction and permanent building maintenance and retail
- **Eliminate under-utilized space** with well-thought housing and facilities for neighborhood
- **Improved security** and lighting along Livonia
- **Development of Amenities** such as youth/senior programming, childcare, stores/retail along Livonia





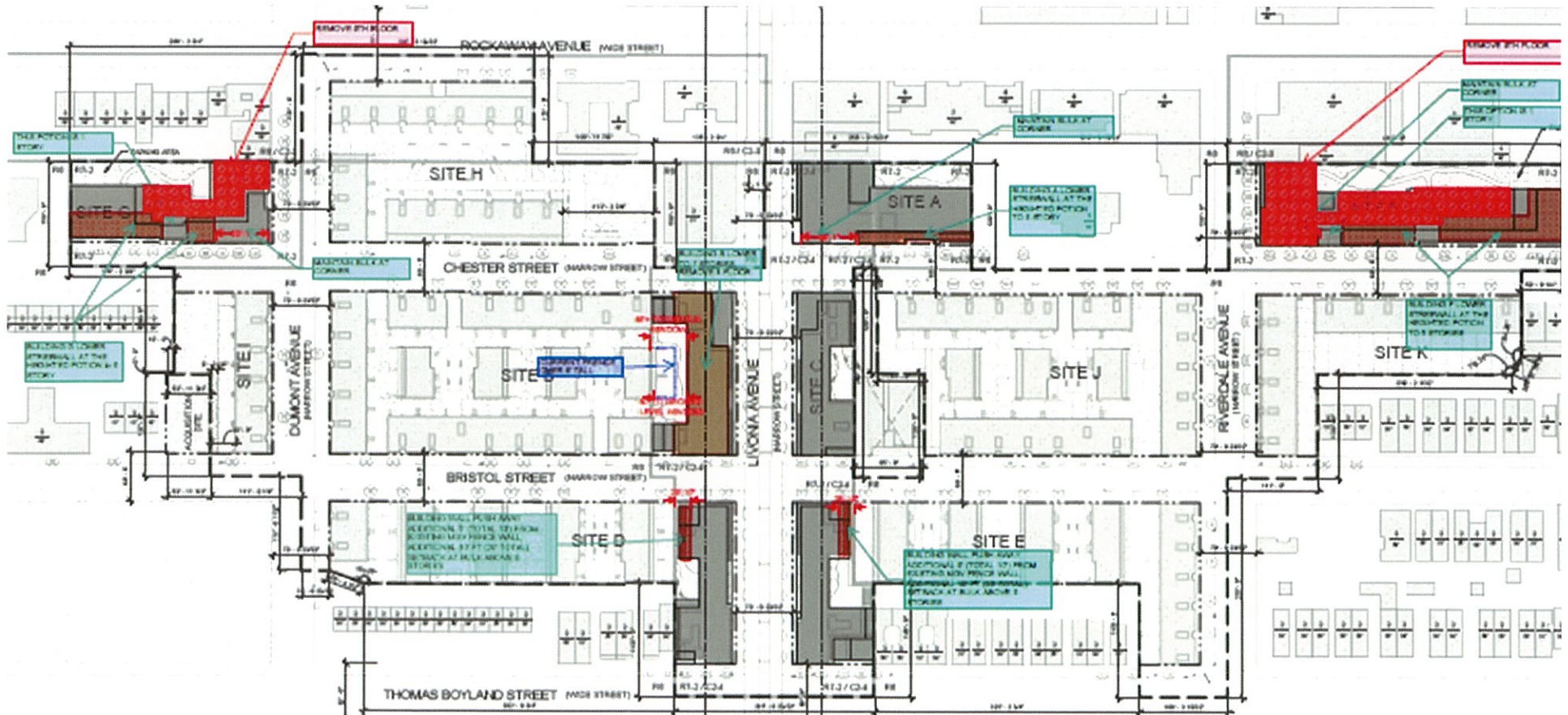
Buildings will activate a commercial corridor below elevated train





Current proposal incorporates comments from City Planning, Community Board & Council Members

- Originally proposed as 12-story buildings, rounds of iterations with DCP, the CB and CMs development maxes at 6-8 story buildings





Proposed development plan assumes approximately 675 affordable units, retail, and services for Brownsville residents

- Increased parking and reduced bulk will impact retail/community facility space to maintain financeable buildings

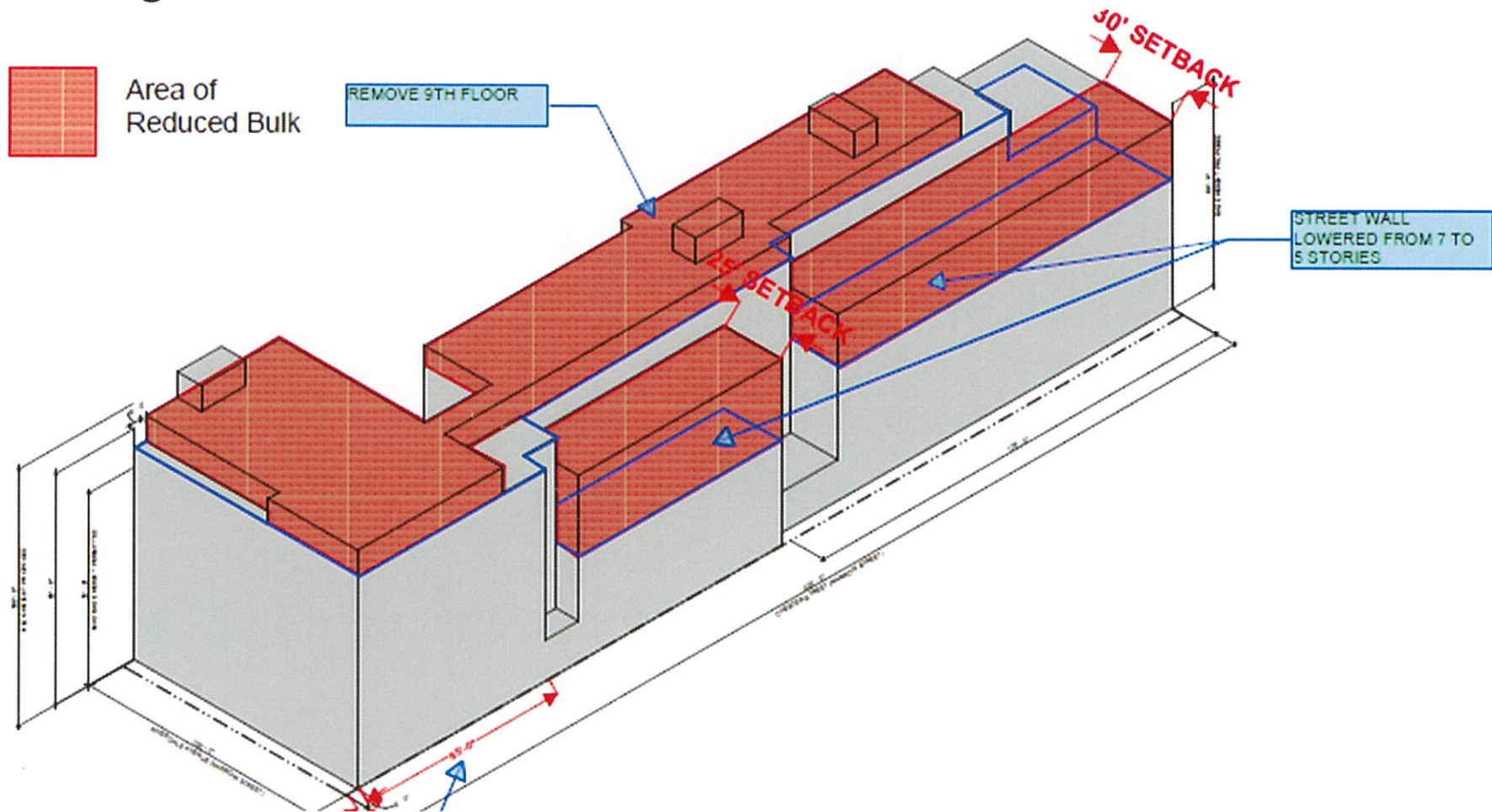


	As Certified	Current
New Buildings	7	7
Units	724	675
Height (Stories)	7-9	7-8
Residential ZFA	622,000 sf	595,000 sf
Commercial / Community Facility ZFA	141,000 sf	70,000 sf
Parking Spaces	36	89



Reduced building height and street wall, creates more setbacks and context with neighborhood

Building G





Current Marcus Garvey Extension Site Plan

Similar in scale to other city-sponsored development on Livonia Avenue





MGX Unit Type Distribution

- Unit mix is based on term sheets and contemplates a mix of unit sizes across the entire 7-building project portfolio

Site	Studio	1-BR	2-BR	3-BR	Total
A	18	35	31	22	106
B	9	28	23	24	84
C	6	26	34	14	80
D	5	26	20	11	62
E	12	33	25	16	86
F	16	45	63	33	157
G	4	34	40	22	100
TOTAL	70	227	236	142	675
Percent	10%	34%	35%	21%	



MGX will have a range of rents reaching as low as \$215 for a studio

- Affordability similar to existing Marcus Garvey Apartments
- Phase I (B&D) will use HCR SHOP term sheet
- Phase II (A,C,E) expects to utilize HPD/HDC ELLA term sheet

Affordability	Rent Range
Studio	\$215 - \$837
1 Bedroom	\$283 - \$1,058
2 Bedroom	\$425 - \$1,280
3 Bedroom	\$512 - \$1,472

Affordability	Unit Percent Range
Less than 60% AMI	80%
61% to 80% AMI	20%



Developer and CB signed an MOU highlighting efforts to address community concerns and future collaboration



- Best efforts to creatively increase parking options
- Maximize affordability
- Collaborate with CB16 advisory committee on ground floor users
- Allocate tenant amenity space in new buildings for resident meetings & activities
- Commit to hire local and establish workforce plan that includes HIRENYC





Development Timeline



- Certification June 2018
- ULURP Complete March 2019
- Phase I Start Q1 2020 (Livonia South)
- Phase II Start Q3 2020 (Livonia North)
- Phase III Start 2021& 2022 (Site F&G)
- Project Completion 2024

Testimony of Jonathan Bowles
Executive Director, Center for an Urban Future

Before the New York City Council
Subcommittee on Zoning and Franchises Hearing

The Future of the Garment Center
November 15, 2018

Good afternoon, and thank you for the opportunity to testify.

My name is Jonathan Bowles, and I am executive director of the Center for an Urban Future, an independent think-tank based in Manhattan focused on expanding economic opportunity and growing the economy in New York City.

In recent months, we've published studies about the promise of expanding apprenticeship programs, the opportunity to expand the number of older entrepreneurs, and the increasingly important role of tourism to New York's economy. Over the years, we've also written extensively about the need to create more middle class jobs. Several of our reports have focused on the importance of manufacturing to New York's economy, and in 2000 we published a study that I authored about the need to better support New York City's apparel manufacturing sector.

I'm writing to express my strong support for the city's plan to support New York's fashion manufacturing sector.

The fashion industry is hugely important to New York City's economy. As just one example, New York City is home to roughly 28 percent of the nation's fashion designers. And the city's share has been increasing in recent years.

Those designers—and the city's broader fashion industry—benefit greatly from having companies that produce garments right here in New York.

For that reason—and because there are still nearly 12,000 jobs in the city's apparel manufacturing sector that pay about \$57,000 a year on average—I very much believe this is a sector worth supporting.

A couple of decades ago, I would have argued that the way to support the apparel manufacturing industry was through protecting the special garment district. In fact, in the report I authored in 2000, one of our key recommendations was: Enforce Current Zoning Laws in the Garment Center.

But I think a different approach is required today.

When I authored that report in 2000, I honestly thought that the garment industry's job losses were hitting a bottom.

But since 2000, the city's apparel manufacturing industry has lost another 102,000 jobs.

This represents 99.9 % of all manufacturing job losses in the city during that period.

During the same period, private sector jobs in the city increased by 750,000.

Even in the last few years, the steady job losses in the sector have continued. In the last 12 months, employment in apparel manufacturing declined by 1,000 – or 8 percent. The year before that, the sector lost 900 jobs. The previous year, it was 1,700 jobs.

The special district no longer reflects the realities of today's garment industry. But it also fails to reflect another reality in New York's economy: that there are loads of companies in other key sectors that would greatly benefit from being in the garment district.

Architects, tech startups, entertainment companies, arts organizations, human services nonprofits, and many others have already started moving to the district. These companies hail from sectors that are also very important to New York's economy, and today the garment district offers them some of the most affordable office rents in the borough—especially as rents are steadily rising in the Flatiron District, Union Square, Chelsea and other neighborhoods that once offered more affordable prices.

It's only a good thing for New York's economy if more firms like these are able to locate in the Garment District.

While it no longer makes sense to preserve the special district, it is worth supporting a more calibrated plan to preserve what's left of the unique fashion ecosystem in Manhattan's garment district—and help protect remaining garment companies from rapidly rising rents.

I believe that the plan put forward by Speaker Johnson, Borough President Brewer, and EDC does just that.

I urge you to support it.



**TESTIMONY FROM THE ASSOCIATION FOR A BETTER NEW YORK BEFORE CITY
COUNCIL SUBCOMMITTEE ON ZONING AND FRANCHISES**

November 15, 2018

Good afternoon. Thank you for the opportunity to testify on behalf of the Association for a Better New York (ABNY), a 47-year old civic organization that promotes the effective cooperation of public and private sectors to improve the quality of life for all New Yorkers. ABNY would like to express our support for the rezoning proposal put forward by the Economic Development Corporation and the Department of City Planning.

The fashion industry and garment district have been critical components of New York City's economy for hundreds of years. As New York's dynamic economy continues to evolve, it is important to deeply consider the changes taking place from a land use and economic development perspective. We believe that the rezoning proposal put forth takes a comprehensive look at the future of the garment district and fashion industry at large.

The rezoning of the garment district is a project the city has been deeply considering for decades. We believe that the proposal put forward by the Economic Development Corporation and the Department of City Planning is a product of those years of contemplation, and we appreciate the consideration given to evolving nature of the fashion industry in New York City, the inclusion of incentives for businesses to remain the garment district, and resources and support for businesses moving to other parts of the city that also represent opportunities for the fashion industry to thrive. While we would have encouraged higher densities in a well transited core of the city, we believe that overall this proposal thoughtfully considers the area's evolving uses and will lead to smart and respectful growth in the garment district.

We look forward to a productive and inclusive discussion on the proposed development and encourage this subcommittee and the New York City community at large to support the project. Thank you all again for your time. I appreciate the opportunity to testify today.

115 Broadway, New York, NY 10006
www.abny.org
212-370-5800



CFDA Statement for Garment Center Hearing - CC Subcommittee on Zoning and Franchises
Thursday, November 15, 2018

My name is CaSandra Diggs and I am the Chief Financial and Operating Officer at the Council of Fashion Designers of America Foundation (CFDA). On behalf of Steven Kolb, President and CEO of the CFDA, I'd like to read a statement in support of the NYCEDC's initiatives outlined for your consideration today.

As the governing body of the American fashion industry, the CFDA not only supports its 500+ CFDA Members and emerging brands through its robust programming, but also stands as a front line of support for fashion manufacturers.

Through impactful programs such as the Fashion Manufacturing Initiative (FMI) in partnership with the NYCEDC and industry stakeholders like Andrew Rosen of Theory, the Coach Foundation and Ralph Lauren, we have made significant strides to support the local NYC fashion manufacturing sector since 2013.

FMI includes the FMI Grant Fund, which has invested \$2.8 million to 25 fashion manufacturers, of which 13 have been located in Midtown Manhattan, to invest in advanced technology, as well as manufacturing showcases, collaborations and workforce development programming. FMI has brought local manufacturing to the forefront of the industry's conversations and helped build crucial relationships between designer and manufacturer, which leads to more economic growth for the city.

The CFDA will expand its programming greatly to not only continue to help manufacturers acquire new technology to remain competitive in the global market, but also aim focus at other ways to increase local production, enhance the city's fashion manufacturing workforce and market these incredible manufacturers to the fashion industry at-large.

We believe the future of the industry is a city-wide ecosystem, but we remain committed to supporting factories in Midtown. This is why the CFDA fully supports the EDC's ideas put forth, including the IDA program and the building procurement. Mechanisms such as the zoning preservation have been proven to be a lacking system for fashion manufacturing and we believe these modern ideas will help preserve fashion manufacturing for New York's Garment Center. These solutions were researched thoroughly in direct response to the Garment Center Steering Committee from last summer and are a viable option to help move the fashion manufacturing sector forward.

Thank you.



Olmstead
Properties INC.

Management, Leasing and Consulting
575 Eighth Avenue Suite 2400
New York, NY 10018
www.olmsteadinc.com

Samuel Friedfeld
212.564.6662
Fax: 212.564.6667
sfriedfeld@olmsteadinc.com

Chairman Moya and distinguished Members of the Committee,

My name is Samuel Friedfeld and I work with Olmstead Properties. I handle leasing and management for 525 7th avenue. Olmstead Properties has extremely deep ties to the Garment District as we have owned 575 8th Avenue for close to 80 years and 525 7th Avenue for 20 years. We also manage and help lease several other properties in the district. As you can see, I have not been around as long as 575 8th Avenue, but I have been around long enough to see the changes in the neighborhood and understand its true potential.

At 525, we made a business decision to stay a Fashion Showroom building. As time went on, we realized there were less sample and manufacturing tenants and more high fashion and showroom tenants. Some of our tenants include Hugo Boss, Valentino, Nicole Miller and Columbia, none of them have a manufacturing component within our building but at the same time they represent everything that is great about the district's historic past.

I am here today to support the City Planning and Economic Development initiatives.

I believe lifting the district zoning restriction is critical because it prohibits property owners from investing in the neighborhood. All of the adjacent neighborhoods including Bryant Park, Times Square, the soon to be Hudson Yards and Chelsea have benefited from the decade's long uptick in economic activity, but the Garment District has been partially, and in many cases fully, left out of this equation.

I believe that all laws are created with good intent in mind, but as time goes on, a law may become less relevant, so much to the point where it begins to hurt the people it set out to help. I believe this is the case with the Garment District zoning laws. There is factually no proof that any law has helped keep one manufacturing job in the district, or in the state or in the country. What there is proof of however, is that new and exciting opportunities in the form of tech, advertising, media and internet companies are coming to the Garment Center and they are bringing with them new jobs and the potential for investment. I believe these companies are the future of the Garment Center. With current zoning restrictions on the books, I believe we will stall all the potential growth of the TAMI companies. The economic plan that EDC has presented will be the most efficient way to provide support to garment manufacturers.

I urge you to support both these proposals because I believe they represent a fair and balanced solution to the problem at hand. Manufacturers will receive a more meaningful form of assistance and the Garment District will finally be able to live up to it's full potential.

Thank you.

STATEMENT OF WILLIAM M. SILVERMAN

I am the co-manager of JIJ Bricken LLC, the owner of the Bricken Arcade at 225 West 37th Street and 230 West 38th Street. My family has been in the real estate business in the Garment District for four generations.

I submit this statement in support of the City Planning and Economic Development efforts to eliminate the preservation of existing restrictive zoning in the Garment District and to replace those anachronistic zoning provisions with programs to directly assist garment manufacturers.

I was born in New York City in 1942. I am almost 77 years old and during that time I have observed the decline of garment manufacturing in the City. I remember the time “hand-trucks” really carts filled the streets of the Garment Center loaded with garments and fabric. No more! First, in the 1960’s garment manufacturing went to the Southern United States where labor and other costs were lower than New York City. To remain competitive, garment manufacturing moved again, primarily to Central and South America and then to Asia.

It is entirely appropriate to lift the zoning restrictions not only because they are not in step with business reality, but also, because the zoning restrictions limit the ability to attract tenants that want to be in the Garment District and have different businesses that are not involved in garment manufacturing.

In addition, the zoning restrictions do not work because market conditions no longer support such artificial restrictions. Removing the restrictions will lead to building enhancements and a better more user friendly Garment Industry.

I think the EDC programs that have been proposed would be highly beneficial to the City and its people by providing assistance to garment manufacturers as well as programs that provide

for workforce development and rent guarantees, among other things. The City and the EDC are offering the garment industry support to stabilize and update the business of garment manufacturing that zoning cannot do effectively.

I request that you support these proposals, because I believe the provision recognize the realities of the 21st Century and are fair and reasonable for all parties. The proposals of the City and the EDC will benefit the City and its inhabitants in a positive and constructive way.

Thank you.

William M. Silverman

Asian Americans for Equality

2 Allen Street, 7th Floor • New York, NY 10002

Tel: 212-964-2288 • Fax: 212-964-6003 • www.aafe.org



November 13, 2018

NY City Council
Land Use Subcommittee

Re: AAFE Testimony on Franklin Street, Brooklyn NY Rezoning Application

Dear Honorable Committee Members:

My name is Jennifer Sun and I am the Co-Executive Director of Asian Americans For Equality (AAFE). We are an established 45-year-old non-profit organization providing social services, community development, small business lending, and affordable housing development for NYC's Asian Americans, as well as for low income constituents from all backgrounds in need of our services.

We are the owners of a parcel of land located at 141 Montgomery Street, Brooklyn NY, which is within the rezoning area adjacent to the applicant's property. We had purchased the parcel at a nominal fee from Enterprise Community Partners several years ago, for the purposes of long term affordable housing development. The land comes with deed restrictions that require consent from NYC Housing Preservation and Development (HPD) for development, and it has always been our mission and intent to create fully affordable housing on our site. Over the years, we have attempted negotiations with our neighbor, first Cornell Realty, and now Carmel Partners, to see if there was an opportunity for partnership, to increase the number of affordable units and positive community impact. Unfortunately, we had not reached terms that were agreeable to our organization's non-profit mission, and no partnership was ever realized.

We were approached a final time pursuant to the current rezoning application, to see if there could be an agreement that would be beneficial to the community, as well as to the developer party involved. We have followed the series of public hearings and events over the past weeks, and have heard the concerns raised by the local community. AAFE does not wish to become a wedge during this contentious process, and through careful internal deliberation, we have come up with the following guidelines whereby we would be receptive to a partnership with Carmel Partners.

1. Carmel, via a land swap or land contribution to our site, contributes to a doubling of affordable units built under the proposed R8X rezoning, more than what is possible under the current lot configuration and current R6A zoning.
2. Carmel must also fulfill their minimum MIH requirements and not count the affordable units created by AAFE towards the required MIH affordable unit number.
3. AAFE and Carmel would commit to direct public input with the local community board, elected officials, and local residents to determine the ideal bedroom types and AMI bands.
4. To the greatest extent possible, the design and massing of the new larger development should have no shadow impact on the Botanical Gardens.

Asian Americans for Equality

2 Allen Street, 7th Floor • New York, NY 10002

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5. The affordable units on both AAFE and Carmel's sites should have the maximum local community preference in the housing lottery allowable by Fair Housing law.
6. All affordable units generated from this rezoning will be affordable in perpetuity and fully enforceable by City deed covenant and regulatory agreements.

There may be other considerations not listed here where AAFE is open to work with local stakeholders and community members to refine our position. But at this point in time, these are the conditions we feel that would provide more community benefits.

We thank you for your attention and allowing us to submit our testimony.



The Garment Center Rezoning:
Preserving An Important Industry and A Vibrant Ecosystem
November 15, 2018

Good morning and thank you for the opportunity to testify. I am Adam Friedman, Director of the Pratt Center for Community Development and a member of the garment industry working group assembled by the Borough President and Council Speaker. I was previously President of the Garment Industry Development Corporation and worked to establish the Special Garment Center District when I was at the Board of Estimate.

Many people have worked incredibly hard on this issue including the Manhattan Borough President, the Speaker, the President of EDC and their staffs as well as other agencies. The City is on the right track. Eighteen months ago the City was prepared to initiate a rezoning without any provisions for retaining the extraordinary cluster of fashion-related firms in today's Garment Center.

Now, the City is putting into place tax incentives, a non-profit industry-ownership model and a program to improve the competitiveness of the firms. This is the approach we've been advocating for a decade. However, there are many unresolved issues which make it difficult to give unqualified support at this time.

You'll probably hear today that the zoning failed. That's not true. NYC remains the greatest concentration of designers, producers, schools of fashion, showrooms, textile and other related businesses in the world.

This testimony was prepared by the Pratt Center for Community Development. It does not necessarily reflect the official position of Pratt Institute.

The zoning was intended to preserve this vibrant, constantly innovating ecosystem, not a moment in history. It is a textbook example of the type of ecosystem cities seek to create to grow healthy economies.

I strongly support the city's efforts to subsidize the acquisition of space by a non-profit which will tenant that space and curate it in the best interest of the industry, a critical part of the ecosystem. It will not be cheap. The city's backwards sequencing, its failure to first acquire the space and then change the zoning, contributes to this cost. The \$20m currently set aside will probably have to be increased by \$40-60m for this to be a realistic option. But this is not an outrageous number given that and the City and property owners who should contribute to this cost will benefit tremendously from the change in zoning, essentially a new office district.

There are many other critical issues not yet nailed down:

1. The City needs to get a firm commitment by the business improvement district to provide \$2.5m/year for ten years to support the industry;
2. Next, the City needs to ensure that the \$25m is spent to address the industry's highest priorities. At this point, those decisions are being left up to the BID board which does not include any manufacturers. The spending needs to be accountable to the industry; and
3. Finally, the IDA needs to ensure that as tenants move or go out of business, the protected space is re-tenanted with apparel companies and not secretly rented to illegal office tenants;

The city is headed in the right direction but the work is not over and everyone must stay engaged to find the space, to find the necessary funding, and to create a new mechanism that is accountable to the fashion industry and to ensure that the funds are spent in the industry's best interest.



November 15, 2018

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MAS Comments regarding the Garment Center Zoning Text Amendment Proposal, CEQR No 17DCP149M, Manhattan, NY

The Garment District is home to one of New York City’s oldest, most iconic industries. Its success is dependent on an interconnected web of garment manufacturing businesses remaining in Midtown—close to one another and close to the rest of the fashion, costume, and apparel industries.

In the summer of 2017, MAS released results from surveys regarding the Garment District. Our surveys demonstrated the role of Manhattan’s Garment District as the center of gravity for the industry. Rent increases and development pressures were found to be the biggest threats to Garment District businesses.

Later that summer, the Garment District Steering Committee concluded that Manhattan’s Garment District needed a minimum of 500,000 square feet of affordable space protected for manufacturers for the industry to continue to thrive.

Today we are encouraged by the City's commitment to preserve the Garment District through tax abatement; business development programs and an initiative to seek a non-profit partner to purchase and manage a co-op for manufacturing tenants.

Progress has been made, 200,000 square feet has been secured under the NYCIDA tax incentive program, but that critical mass of 500,000 square feet has not been achieved. Technical grants to support the fashion industry are on their way based on a vote yesterday by the City Council’s Finance Committee.

However, the final, and most critical, element of this three-pronged strategy: the acquisition of a building to create a permanently affordable space for Garment District businesses is encountering some bumps in the road. Although, the able staff of the New York City Economic Development Corporation has issued the RFEI for this project, there is no consensus in the community that the City’s investment in such a venture is adequate to make such a project pencil out.

Before you today is the City Council’s first step to removing the text amendment that was designed many decades ago to protect garment manufacturing at the core of the New York City garment industry. Although, we do not doubt the integrity, hard work or commitment that many City officials have shown for the health and well-being of the Garment District, we are still very far away from

achieving the minimum square footage recommended by the Steering Committee. This should give you pause. It gives MAS pause.

When MAS and many of our partners agreed to support the initiation of the process to remove the text amendment we were assured that there would be adequate time to achieve significant progress on the other legs of the program.

You have tools that must be used to ensure that the lifting of the text amendment remains an incentive to achieving the full minimum commitment to manufacturing in the District. You may postpone the date this legislation becomes effective. Or you may make this approval conditional on further progress being made towards the purchase of a building and the enrollment of additional landlords in the tax abatement program. Or, you might recommend that a greater City capital commitment be ready should it be required.

MAS welcomes the progress toward preservation of production space in the Garment District. However, we call on this Committee and the City Council more broadly, to ensure that we are truly hitting the mark we needed to ensure a robust future for the Garment District in Manhattan.



GEORGE COMFORT & SONS, INC.
Real Estate Since 1919

November 15, 2019

200 MADISON AVENUE
NEW YORK, NY 10016

212-481-1122
Fax: 212-213-1865

Hon. Francisco Moya
Chair of the Subcommittee on Zoning and Franchises
New York City Council
250 Broadway
New York, NY 10007

Chairman Moya and Members of the Committee:

I am Dan Dilmanian, representing George Comfort & Sons, a family owned real estate company now in our 100th year of business. We are the longtime owners of two properties in the Garment District, 498 Seventh Avenue and 307 West 38th Street, which is in the Preservation Area. Until 1994, we also had a 50 year leasehold interest in 239 West 39th Street, also in the preservation area.

We support the zoning text amendment and the proposals to provide direct support to the garment manufacturing industry because we believe these actions take a fair approach to all the interests involved, and we believe that the outcome will be good for all of us in the Garment District and for New York City.

Our company has witnessed the decline of garment manufacturing and firsthand, and indeed our business has been impacted by it. Both of our properties within the preservation area were once 100% occupied by garment manufacturers or garment related businesses, but, by the late 1980s, production had started moving overseas. Our garment business tenants were struggling to pay just \$8 per sq. ft. in rent, and there were frequent business failures and defaults on leases. Despite our good faith efforts, our occupancy by garment tenants declined every year, and by 2000 there were no new garment manufacturing businesses coming in.

During the 1990s, other types of tenants started gravitating to the Garment District, seeking our more affordable rents for a convenient, midtown location. These small businesses included construction companies, packaging companies, and early software outfits. More recently, we have seen creative companies, arts and non-profit organizations attracted by our affordable loft spaces and proximity to excellent transportation options.

These alternative uses kept the Garment District from going into a steep decline, yet in much of the neighborhood, they remain prohibited. The restrictions should be lifted because it will legitimize these critical tenants and increase our ability to find others. I am also confident that legitimizing this mix of uses will lead to improvements in the neighborhood, and that would be good for everyone who lives, works or does business in Midtown.

But, equally as important, we think the restrictions should be lifted because they didn't work, and it seems that the programs and supports that EDC is proposing will. By providing assistance directly to garment manufacturers, through tools that address everything from workforce development and equipment to rent guarantees, the City is offering the industry a realistic way to stabilize and modernize within its historic home.

I urge you to support both these proposals, as they will benefit everyone in the Garment District.



200 MADISON AVENUE
NEW YORK, NY 10016

212-481-1122
Fax: 212-213-1865

November 15, 2019

Hon. Francisco Moya
Chair of the Subcommittee on Zoning and Franchises
New York City Council
250 Broadway
New York, NY 10007

Chairman Moya and Members of the Committee:

I am Matthew Coudert, representing George Comfort & Sons, and I support the proposal before you today.

George Comfort & Sons is a family owned real estate company now in our 100th year of business, and we have owned or had a stake in properties in the Garment District since 1944. Since that time, our company has seen our building tenancy shift from 100% garment related businesses to a diverse mix of office tenants, including non-profits, arts organizations, tech and media firms.

This shift occurred in response to the dramatic decline in garment manufacturing. Forty years ago, at an accelerating rate, garment production began moving out of New York and ultimately out of the country. This left local manufacturers with too little work. Even the Garment District's below market rents and protective zoning could not keep our manufacturing tenants from going out of business. As these companies failed, often defaulting on their leases, we saw building vacancies rise.

Over time, affordable rents and close proximity to transportation drew other uses to the Garment District, preventing this central Midtown neighborhood from going into a steep economic decline.

We support the zoning text amendment. Legitimizing and encouraging a diverse tenant base in the Garment District makes sense for the neighborhood, for Midtown Manhattan and for New York City. This proposal looks to the future of the neighborhood, and the concurrent EDC economic development initiatives will insure that the garment industry retains its place in it.

These actions take a fair approach to all the interests involved, and we urge you to vote in favor.

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November 15, 2018

Testimony of the New York Building Congress before the New York City Council Subcommittee on Zoning and Franchises

On behalf of the Building Congress, we support the Garment Center Steering Committee's report and funding of the building of the New York City Industrial Development Agency Garment Center.

The New York Building Congress is a nearly one-hundred-year-old organization working to encourage the growth and success of the New York City building industry, and the vibrancy of the City at large. We represent more than 500 constituent organizations employing over a quarter million professionals and tradespeople.

New York's Garment District is the global hub of fashion, but it is also composed of many of the City's thriving and growing organizations. Between 2000 and 2016 job growth in the district has increased by 56. Many of the firms moving into the area include members of the design, architecture and engineering sector and just 3,000 square-foot each.

It's clear that funding the Garment Center is a smart investment that will allow New York to remain the global fashion epicenter. Since the 1950s there has been a steep decline in manufacturing due to global competition, resulting in a shift in industry. We implore you to consider the Steering Committee's recommendations, which will help enable fashion manufacturers to maintain a presence in the Garment District through stable, affordable, long-term leases and preserve 500,000 SF of Fashion Manufacturing space in the Garment Center project.

We support the City committing \$20 million to facilitate the purchase of the Garment Center building with a non-profit partner carrying out operations and management. In addition to acquiring the property, the Garment Center program has the potential to draw fashion innovators of the present and future.

The fashion industry is not just a quintessential part of the New York cultural fabric, it is an economic driver. This year, the industry has paid over 11 billion in wages and generated over 3 billion in taxes. A project of type will strengthen local manufacturing, helping New York's emerging designers innovate and established designers remain competitive.

Therefore, on behalf of the New York Building Congress we urge the Council to fully fund and support this crucial project to preserve New York's place as the fashion capital of the world.

Thank you for the time to be heard on this important matter.

November 15th, 2018

As a fashion company designing and producing in NYC I assure this Council that the garment industry is a vital component of New York's Fashion economy. This is clearly evidenced by its continued presence in the face of an across the board decline in New York's other manufacturing sectors. Our garment companies have relied upon the current zoning text to maintain their presence for the industry. To lift that text without first securing the promised space is a disservice to them, the industry and the process that created this agreement. I continue to be in favor of this agreement but strongly ask that the 300,000 square feet be secured first along with the promised permanent dedicated building. I wholly support the statements made by the Design Trust for Public Space, without whose guidance the zoning text would already be history; and the MAS for determining the effects the proposed changes will have on this industry and the Steering Committee for their recommendations. The city has made genuine progress in these goals and I ask **'what is the harm in waiting a little longer to insure the space is in place to secure the industry for another 30 years'**.

- Yeohlee Teng

**THE COUNCIL
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I represent: MCB4

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44269

Appearance Card

I intend to appear and speak on Int. No. 216 Res. No. _____

in favor in opposition

Date: 15 Nov 2018

(PLEASE PRINT)

Name: James Lloyd

Address: 1 Centre St

I represent: MBB Gale Brewer

Address: 1 Centre St

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. GARMENT Res. No. _____

in favor in opposition

Date: 11/15/18

(PLEASE PRINT)

Name: WALLY RUBIN

Address: _____

I represent: COMMUNITY BOARD FIVE

Address: 450 7th Ave.

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 11/15/18

(PLEASE PRINT)

Name: Dylan Sandler

Address: 120 Broadway (DCP)

I represent: Dept. of City Planning

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Matthew Cozzetta

Address: _____

I represent: 6 Cooper St

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Dan Dilmanian

Address: _____

I represent: 6 comfort

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 269 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Yeohlee Teng

Address: _____

I represent: Yeohlee

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 269 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Steven Epstein

Address: _____

I represent: IATSE

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 269 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Marty Frutch

Address: _____

I represent: IOA owner

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 269 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Jonathan Bowles

Address: _____

I represent: Center for an Urban Future

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 269 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Kenneth Fishel

Address: Renaissance Properties NY

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 269 Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Ginny Konludes

Address: A.R.T. New York

I represent: _____

Address: _____

Please complete **THE COUNCIL** *Sergeant-at-Arms*
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 269 Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Steve Boxer

Address: Pachyderm Consulting LLC

I represent: _____

Address: _____

Please complete **THE COUNCIL** *Sergeant-at-Arms*
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 269 Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: ERIC Gural

Address: GFP Real Estate

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 269 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Andy Odiz

Address: _____

I represent: ABS Partners RealEstate

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 269 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: William Silverman

Address: _____

I represent: O Herbourg

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 269 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Angela Sung Pinsky

Address: _____

I represent: Association for a Better NY

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. Garment Res. No. 269
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Susan Chin

Address: _____

I represent: Design Trust for Public Space

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. Garment Res. No. 269
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Elizabeth Goldstein

Address: _____

I represent: MASNYC

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. garment Res. No. _____
 in favor in opposition

Date: 11.15.18

(PLEASE PRINT)

Name: Samuel Friedfeld

Address: 525 Seventh Avenue, NY 10018

I represent: Olmstead Properties

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. Garment Res. No. _____

in favor in opposition

Date: 11.15.18

(PLEASE PRINT)

Name: William Silverman

Address: 225 W 37, NY 10018

I represent: Otterbourg Properties

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. Garment Res. No. _____

in favor in opposition

Date: 11/15/18

(PLEASE PRINT)

Name: Eric Gural - GPP Real Estate

Address: _____

I represent: GDA - Garment District Alliance

Address: 520 Eighth Ave.

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. Garment Res. No. _____

in favor in opposition

Date: 11.15.18

(PLEASE PRINT)

Name: Barbara Blair

Address: 209 W 38 NY 10018

I represent: Garment District Alliance

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. garment Res. No. _____

in favor in opposition

Date: 11.15.18

(PLEASE PRINT)

Name: Matt Coudert

Address: Ownership

I represent: Geo Comfort + Son

Address: 498 Seventh Avenue, NY 10018

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. garment Res. No. _____

in favor in opposition

Date: 11.15.18

(PLEASE PRINT)

Name: Kenneth Fischer

Address: _____

I represent: Ownership - Renaissance Properties

Address: 264 West 40th St 10018

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. garment Res. No. _____

in favor in opposition

Date: 11.15.18

(PLEASE PRINT)

Name: Marc Benquavid

Address: _____

I represent: Ownership

Address: 330 West 38th St. 10018

THE COUNCIL
THE CITY OF NEW YORK

Garment
District
Zoning

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 11/15/18

(PLEASE PRINT)

Name: Steve Boxer

Address: _____

I represent: Pachyderm Consulting

Address: 66 West 38th St NYC 10018

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. Garment Res. No. _____

in favor in opposition

Date: 11.15.18

(PLEASE PRINT)

Name: Tom Block

Address: 499 Seventh Ave 10014

I represent: Ownership

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. Garment Res. No. _____

in favor in opposition

Date: 11.15.18

(PLEASE PRINT)

Name: Andy Udvis

Address: _____

I represent: Ownership - ABS Partners

Address: 1001 Sixth Ave 29 W. 38th

9 East 37th St. 10018

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. Garment Res. No. _____

in favor in opposition

Date: 11.15.18

(PLEASE PRINT)

Name: Dan Dilmanian

Address: Geo. Comfort + Sons

I represent: Ownership

Address: 498 Seventh Avenue NY 10018

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. Garment Res. No. _____

in favor in opposition

Date: 11.15.18

(PLEASE PRINT)

Name: Chris Jaskiewicz

Address: The Gotham Organization

I represent: Ownership

Address: 66 West 38th St 10018

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. Garment Res. No. _____

in favor in opposition

Date: 11.15.18

(PLEASE PRINT)

Name: Phil Lavoie

Address: Gotham Organization - 66 W 38th

I represent: Garment District

Address: 432 Park Ave NYC 10016

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. garment Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Ginny Loukas

Address: 5201 8th Avenue

I represent: Act/NY - garment district

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Melichetta Feinberg

Address: _____

I represent: Mr. Embroidery Studio

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Adam Friedman

Address: _____

I represent: Pratt Center

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Basinda Diggs

Address: _____

I represent: GCFA District Alliance

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Barbara Blair

Address: _____

I represent: Garment District Alliance

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Cecilia Kushner

Address: _____

I represent: NYCEDC

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Edith Hsu - Chen

Address: _____

I represent: Department of C. Planning

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: James Patchett

Address: _____

I represent: NYC Economic Development Corp

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Michelle Brady

Address: _____

I represent: NANAN

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 270-271 Res. No. _____

in favor in opposition

Neutral Date: _____

(PLEASE PRINT)

Name: Zach Bommer

Address: _____

I represent: AAFE

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 270 Res. No. 271

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Demitrales Harkins

Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 270 Res. No. 271

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Geoffrey Davis

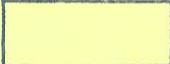
Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card



I intend to appear and speak on Int. No. 270-271 Res. No. _____

in favor in opposition

Neutral Date: _____

(PLEASE PRINT)

Name: Jennifer Sun

Address: _____

I represent: Asian Americans For Equality/AAFE

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card



I intend to appear and speak on Int. No. 271 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: David Cohen

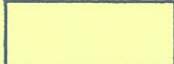
Address: 32 BJ SEIU

I represent: _____

Address: 25 West 18th Street

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card



I intend to appear and speak on Int. No. 293 Res. No. 277

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: CYRUS SMITH

Address: 48 NEWTON AVE

I represent: Brownsville Think Tank

Address: MATTERS 48 NEWTON AVE

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. 270-271 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Eli Colton

Address: _____

I represent: _____

Address: _____

Please complete **THE COUNCIL** *Sergeant-at-Arms*
THE CITY OF NEW YORK

Appearance Card

[]

I intend to appear and speak on Int. No. C1804887SK Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Genevieve Michel

Address: _____

I represent: HPD

Address: _____

Please complete **THE COUNCIL** *Sergeant-at-Arms*
THE CITY OF NEW YORK

Appearance Card

[]

I intend to appear and speak on Int. No. C1804887SK Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Lin Zeng

Address: _____

I represent: HPD

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 270-271 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Sakia Fletcher

Address: Medgar Evers College

I represent: Medgar Evers College Students

Address: _____

Please complete **THE COUNCIL** Sergeant-at-Arms
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 240-271 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Dale Ferdinand

Address: 447 Prospect Place

I represent: Haitian American Supplier ~~Industry~~

Address: Diversity Task Force

Please complete **THE COUNCIL** Sergeant-at-Arms
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 273-277 Res. No. _____

in favor in opposition

Date: 11/15/2018

(PLEASE PRINT)

Name: Richard Lobel

Address: Skilton Lobel

I represent: Brownsville Livonia Associates LLC

Address: 1865 Palmer Ave Levickment NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 273-277 Res. No. _____

in favor in opposition

Date: 11/15/2018

(PLEASE PRINT)

Name: Joshua Weissbuch

Address: 88 Tuscan Rd

I represent: Brownsville Livonia Associates LLC

Address: 1865 Palmer Ave Larchmont NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 273-277 Res. No. _____

in favor in opposition

questions Date: 11/15/18

(PLEASE PRINT)

Name: Lisa Connor

Address: 419 Park Ave So

I represent: Applicant - Brownsville Livonia

Address: same as above

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 270271 Res. No. _____

in favor in opposition

Date: 11/15/18

(PLEASE PRINT)

Name: SAN PIERRE

Address: 495 FLATBUSH AVE BK, NY 11225

I represent: HAIYAN AMERICAN SUPPLIER DIVISION TASK FORCE

Address: 495 FLATBUSH AVE BK, NY 11225

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 269 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Adam Friedman

Address: _____

I represent: Pratt Center For Comm Develop

Address: Brooklyn NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 270-271 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: DAVID VLSSE

Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 270-271 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: RAY LEVIN

Address: _____

I represent: _____

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 273-277 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Clovis Thorn

Address: 37-34 29TH ST, LIC, NY 11101

I represent: Grand St. Settlement

Address: 80 Pitt St, NY NY 10002

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 270221 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Alicia Boyd

Address: _____

I represent: _____

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 273277 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Zamir Khan

Address: _____

I represent: 32Bj

Address: _____

▶ Please complete this card and return to the Sergeant-at-Arms ◀

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 270/271 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: MATTHEW FELDMAN

Address: 805 Third Ave, 20th Floor NY NY 10022

I represent: CP VI Crown Heights LLC

Address: 805 Third Ave 20th Floor NY NY 10022

▶ Please complete this card and return to the Sergeant-at-Arms ◀