



City of New York
DEPARTMENT OF
HOUSING PRESERVATION AND DEVELOPMENT
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nyc.gov/hpd

MARIA TORRES-SPRINGER
Commissioner

**Testimony of Commissioner Maria Torres-Springer
NYC Department of Housing Preservation and Development
New York City Council Subcommittee on Zoning and Franchises
Hearing on the Inwood Rezoning
July 10, 2018**

Good afternoon Chair Salamanca and Chair Moya, and members of the New York City Council. Thank you for having me here today. My name is Maria Torres-Springer. I am the Commissioner of the Department of Housing Preservation and Development, and I'm here to speak in support of the Inwood Planning Initiative.

Good afternoon Chair Salamanca and Chair Moya, and members of the New York City Council. Thank you for having me here today. My name is Maria Torres-Springer. I am the Commissioner of the Department of Housing Preservation and Development, and I'm here to speak in support of the Inwood Planning Initiative. Before I begin, I want to extend my thanks to Councilmember Ydanis Rodriguez for his extraordinary leadership in the Inwood community. Councilmember Rodriguez has been a tireless advocate for the needs of his community, and through his vision and work with the City, this proposal has continually improved.

Over the past several years, HPD has been closely involved in the Inwood neighborhood planning process, and we have developed and are continuing to refine a housing strategy for the area, outlined in our Draft Inwood Housing Plan.

Between 2002 and 2014, rents in Inwood and Washington heights increased by 38%, which is more than rents increased citywide. We know that over the same period incomes in this neighborhood did not rise by 38% - if anything, incomes stayed the same over that same period. While Inwood has significant diversity of incomes, as you can see on this chart, there are a significant number of low income and extremely low incomes residents in the neighborhood.

As you may know, Inwood has one of the highest concentrations of rent-stabilized housing in the city: More than 2/3 of all homes in Inwood and Washington Heights are regulated by a government agency, compared to just one-third of homes across the city. Since 2003, HPD has financed the preservation of over 2,000 affordable homes in Inwood and Washington Heights. The last affordable apartment building constructed in Inwood, however, was over 10 years ago. A big reason for that is that there is very little land in Inwood that is zoned for residential available to be developed as housing. The proposal before you today will allow us to reverse this trend to create thousands of new affordable apartments in Inwood over the next several years.

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The rezoning proposal is crucial to help address high demand for housing by enabling growth in appropriate areas, while requiring permanently affordable apartments. Working closely with our sister agencies and through robust engagement with the community, HPD developed the Draft Inwood Housing Plan, which memorializes a set of strategies to address the area's unique housing needs. First and foremost, as always, we want to preserve existing affordable housing and keep people in their homes. But we also need to ensure we are pursuing opportunities for the creation of new affordable housing— in order to keep pace with our growing population. Lastly, we are continuing to make improvements to the way we do business to ensure residents are better able to access and benefit from our investments.

Preserving the affordable housing that already exists in Inwood is HPD's number one priority in Inwood. HPD offers loans and tax incentives to help building owners improve the quality, physical condition, and efficiency of their properties. In exchange for financial assistance, property owners are required to maintain rents at levels that are affordable to existing tenants, and to limit rent increases. We are conducting more proactive and strategic outreach to property owners than ever before to let them know about our financing programs to make building improvements and extend affordability. Our new Neighborhood Pillars initiative will dedicate funding for non-profits and mission-based organizations to acquire and rehab unsubsidized rent-stabilized buildings so they can maintain the affordability of this crucial housing stock. We also launched a Landlord Ambassador pilot, and designated the Mutual Housing Association of New York to conduct outreach and provide support to local property owners interested in using our financing programs to preserve affordability.

HPD continues to improve housing quality through enforcement of the housing maintenance code, which is critical to ensuring that landlords provide proper maintenance and essential services. Since 2014, HPD has increased the number of inspections in Inwood and Washington Heights by 11% and the number of violations issued by 21%. HPD is part of the multi-agency Tenant Harassment Protection Task Force. Each enforcement agency issues appropriate violations for physical conditions or conducts appropriate investigations into allegations of harassment. In Manhattan CD 12, the Task Force has inspected 20 buildings with 570 dwelling units, issuing 1,359 hazardous or immediately hazardous violations. 3 buildings have ongoing cases in Housing Court initiated by HPD and/or the tenants and 11 buildings are active in the AEP program. Referrals to the Task Force by community groups and elected officials have been instrumental in identifying some of the most egregious cases of harassment throughout the city.

In Inwood where more than two-thirds of all apartments are rent stabilized, we know that keeping tenants in their homes is going to be the most important way to ensure long-term affordability. We have launched a number of important new programs to protect tenants from harassment and deregulation.

Outreach specialists from TSU, who are trained in community engagement and collectively speak over 12 languages, conduct door-to-door outreach to document building violations, inform tenants of their rights and identify housing-related issues. Tenants in need of assistance are comprehensively case-managed and connected to a range of resources, including emergency repairs and free legal services. From July 2015 to June 2018, TSU specialists have knocked on over 31,417 doors and assisted over 2,477 tenants in Inwood.

To support tenants who are facing eviction or harassment, the City has expanded funding for civil legal services for low-income New Yorkers at the Human Resources Administration's

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Office of Civil Justice. From 2015 to May 2018, City-funded legal services programs for tenants have assisted approximately 1,300 households in the Inwood zip code of 10034 providing legal assistance to approximately 3,300 Inwood residents facing displacement, eviction and harassment by unscrupulous landlords.

HPD will include Inwood and Washington Heights in its new Partners in Preservation initiative to establish a hub for neighborhood-based anti-displacement initiatives. A core element of the program will include additional resources for community-based organizations to organize tenants and develop and implement action plans for at-risk buildings in close coordination with HPD and other partners.

The Certification of No Harassment (CONH) Program is a product of a collaborative, year-long working group in response to growing interest across the city. The program will identify specific buildings that meet the criteria indicating that tenants may be harassed. Owners of such buildings will be required to obtain a CONH before being granted permits for demolitions, or change of use or occupancy.

One of the major goals of this rezoning is to encourage new construction of affordable housing, something that hasn't happened in Inwood in about 10 years. First, through the application of the new Mandatory Inclusionary Housing program, any new development in most of the neighborhood would be required by law to set aside at least 25% to 30% of all apartments as permanently affordable. We also offer subsidies and tax benefits to encourage developers to work with us to develop 100% affordable housing. Several property owners have already committed to using City financing to develop affordable housing that exceeds the minimum MIH requirements. I also want to highlight that any project in an MIH area that receives HPD subsidy must set aside an additional 15% of apartments as permanently affordable, on top of MIH requirements.

And as always, we are continuing to identify opportunities to develop affordable housing on publicly-owned land, for example at the Inwood Affordable Housing and Library Development project, which I will talk about more in a second. We also continue to evaluate the feasibility of other public sites in the neighborhood for affordable housing. HPD in partnership with the Housing Development Corporation and the New York Public Library recently announced the development plans for the Inwood Affordable Housing and Library Development Project. The development team is being led by longstanding nonprofit groups, the Community League of the Heights (CLOTH) and Children's Village, in partnership with Alembic and Ranger, who bring years of development experience to the team. The project will create 175 affordable deeply affordable homes, a new, modern Inwood Library, space for the City's Universal Pre-Kindergarten program, and the ACTS (Activities, Culture, and Training Center) which will have cultural and educational programming. All 175 apartments will be permanently affordable. The ACTS Center will provide community facility space for education, health and wellness related programs, jobs training and cultural activities. The activities, programs, and services at the ACTS Center will be open to the public.

In community meetings in Inwood, we have heard time and again that in addition to creating new affordable housing, the City needs to make sure that residents in need can access that housing. We are working to remove barriers to qualifying for affordable housing. In June 2018, HPD updated the affordable housing Marketing Handbook to strengthen the City's policies and procedures for allocating affordable housing through NYC Housing Connect lotteries. These

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policy changes make affordable housing more accessible to New Yorkers who would have otherwise been previously disqualified, and include:

- Limiting options to reject applicants based on credit history and debt and ensuring that applicants can no longer be punished for taking their landlords to court.
- Clarifying eligibility guidelines for a speedier review process by eliminating mandatory employment history requirement for self-employment and freelance income.
- Introducing additional protections for domestic violence survivors, such as ensuring applicants cannot be denied housing for adverse factors, such as poor credit or negative debt payment history, if those factors are a direct result of domestic violence, dating violence, sexual assault, or stalking.

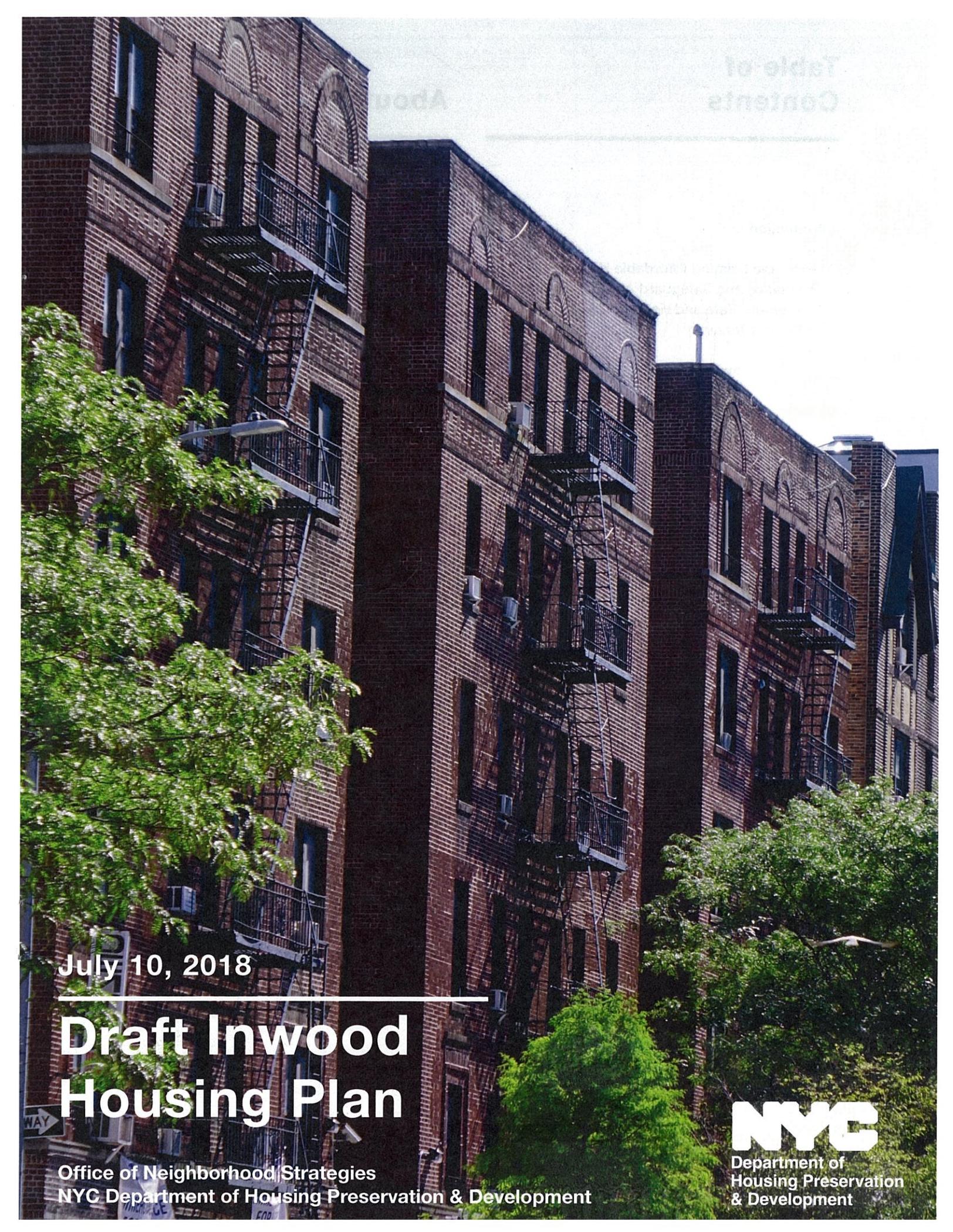
We continue to take steps to help residents become better prepared to submit complete and accurate applications including our Housing Ambassadors program, which trains local community groups to help residents submit applications for the lottery. Community League of the Heights (CLOTH) is our partner in Inwood and Washington Heights.

Last but not least, we are committed to ensuring that our investments in affordable housing create jobs and strengthen small businesses.

Through HireNYC, all developers are now required to post available construction jobs with the local Workforce 1 Center and interview qualified candidates. In our public site RFPs, we now require developers to create a targeted hiring outreach plan as part of the competitive review. Our new Build Up Program requires developers to spend at least a quarter of all HPD-supported costs on certified minority- and women-owned businesses (MWBES).

Before concluding, I would like to thank the Inwood community for their advocacy for the neighborhood. Many of these strategies, whether applied locally or city-wide, have come directly from our conversations and collaboration with community groups and elected officials here in Inwood. I look forward to our continued collaboration, and I am happy now to take any questions.





July 10, 2018

Draft Inwood Housing Plan

Office of Neighborhood Strategies
NYC Department of Housing Preservation & Development

NYC
Department of
Housing Preservation
& Development

Table of Contents

About

Introduction	3
01 Preserve Existing Affordable Housing	4
• Finance and Safeguard Affordability	4
• Promote Safe and Healthy Housing	5
• Protect Tenants	6
02 Develop New Affordable Housing	8
03 Increase Access to Affordable Housing	11
04 Promote Economic Opportunity	14
Track and Report	15

This draft housing plan summarizes the goals, strategies, and actions that the City proposes to undertake in response to a range of needs and priorities in the neighborhood, including those articulated by residents and stakeholders in the InwoodNYC Planning Initiative.

Visit edc.nyc/InwoodNYC to download the *InwoodNYC Action Plan*

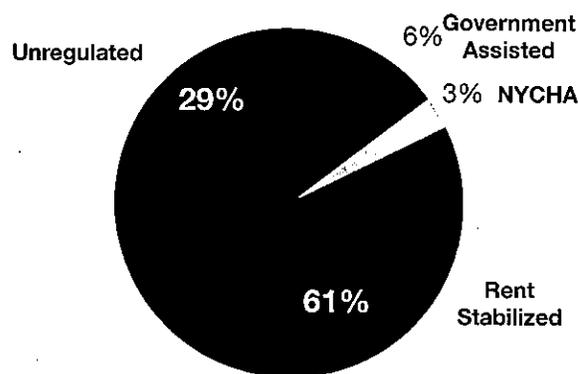
Introduction

Community District 12 (CD12), which encompasses both Inwood and Washington Heights, has one of the largest concentrations of rent regulated housing in New York City. More than two-thirds of all housing in the neighborhood is regulated by a government agency, compared to just one-third of all homes across the city.¹ This stock of stable, affordable housing has served local residents for many decades.

However, as the city's population continues to grow, increased demand is putting pressure on Inwood's housing supply. A lack of housing development – especially new affordable housing – coupled with slow growth in wages, is making Inwood less affordable. In the past two decades, only 200 new affordable apartments have been built in Inwood. At the same time, rents are rising faster in CD12 than in the city as a whole, with a 38% increase from 2002 to 2014 compared to 24% citywide.² These trends could lead to more harassment by landlords looking to capitalize on market changes.

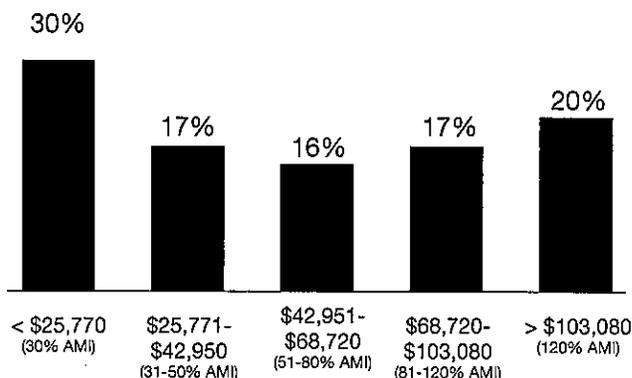
The Inwood NYC Planning Initiative is a comprehensive effort to ensure that Inwood remains an affordable neighborhood for working and immigrant families in the face of these rising challenges. By enabling growth in appropriate areas, while requiring permanently affordable apartments in any new development and at the same time aggressively pursuing the preservation of existing affordable housing, the City is working to make Inwood a bastion of affordability for generations to come.

Regulatory Status of Existing Homes (CD12)



HPD Research and Evaluation, 2016

Household Income Distribution (CD12)



Sample incomes are for a three-person household based on 2017 HUD Income Limits; ACS, 2012-16 for Sub-borough Area, which approximates CD12

Affordable Housing Development and Preservation Activity in Inwood (CD12)

Type	2003-13	2014-17	Total
New Construction	284	93	377
Preservation	1,654	445	1,937
Total Units	1,938	538	2,476

HPD Performance Management and Analytics, Jan 2018

¹ HPD Research and Evaluation, 2016

² NYC Housing and Vacancy Survey, 2002 and 2014

01 Preserve Existing Affordable Housing

The Administration is working on multiple fronts to keep New Yorkers in their homes and make sure our housing stock is in good financial and physical shape.

Preservation is HPD's number one priority, and the agency has developed a comprehensive strategy specifically for Inwood. The City preserves affordable housing by financing improvements to residential buildings in exchange for restrictions on the rents an owner can charge; rigorously enforcing the Housing Maintenance code; and protecting tenants from deregulation and harassment. Under Housing New York, HPD has created new tools to achieve preservation goals in changing neighborhoods.

Finance and Safeguard Affordability

HPD administers loans and tax incentives to help building owners improve the quality, physical condition, and efficiency of their properties. In exchange for financial assistance, property owners are required to maintain rents at levels that are affordable to existing tenants, as well as limit rent increases.

Strategy 1

Offer loans and tax incentives to building owners to keep homes affordable

HPD offers loans and tax incentives to help building owners improve the quality, physical condition, and efficiency of their properties. In exchange for financial assistance, property owners are required to maintain rents at levels that are affordable to existing tenants, and to limit rent increases.

Since 2014, HPD has financed the preservation of 445 affordable homes in CD12. HPD will continue monitoring homes in CD12 with affordability restrictions in its portfolio, and use its various financing programs to preserve and invest in the neighborhood's existing affordable housing stock.

Strategy 2

Host outreach and marketing events to promote programs to preserve affordability

Many Inwood owners are either not aware of HPD's products or do not have experience working with a public agency, but HPD is piloting new tactics to reach and assist those owners.

HPD has developed an outreach strategy specifically targeting property owners in Inwood that includes events, mailings, e-mails, calls, and the proactive surveying of distressed properties.

If you own property and want to know whether HPD's financing programs might be a good fit, please contact letsinvest@hpd.nyc.gov. For more information about HPD's financing programs, visit nyc.gov/letsinvest.

Strategy 3

Help community organizations acquire rent stabilized buildings through the Neighborhood Pillars Program

HPD is launching a new Neighborhood Pillars program to finance the acquisition and rehabilitation of existing rent-regulated buildings to protect current tenants and stabilize communities. As part of this initiative, the City will double the capacity of the NYC Acquisition Loan Fund to \$275 million to enable non-profits and mission-based organizations acquire buildings that are rent-regulated but

not otherwise part of an existing affordable housing program.

Strategy 4

Provide technical assistance to property owners through the Landlord Ambassadors Program

HPD has launched a pilot Landlord Ambassadors program to provide more sustained technical assistance for small- to mid-sized property owners in Inwood who are interested in, but unfamiliar with, the process of securing a loan to undertake building improvements. The Mutual Housing Association of New York (MHANY) has been designated as the Landlord Ambassador for Upper Manhattan. MHANY will provide assistance to building owners who preserve affordability in exchange for City loans and tax benefits.

Strategy 5

Advance preservation projects in City-owned residential buildings

HPD has committed to the rehabilitation of vacant City-owned buildings in the neighborhood. In partnership with local non-profits, Community League of the Heights (CLOTH) and the Northern Manhattan Improvement Corporation (NMIC), HPD is also prioritizing the renovation of two vacant City-owned buildings at 2110 Amsterdam Avenue and 21 Arden Street, respectively.

Promote Safe and Healthy Housing

HPD's Office of Enforcement and Neighborhood Services (OENS) works closely with governmental and community partners

to identify buildings that are in poor condition; assess and develop appropriate strategies to resolve those problems; and develop plans, with responsible owners, to return buildings to firm financial footing and good physical condition. As part of the City's focus in the Inwood area, since 2014 HPD has increased building inspections in CD12 by 11% and violations issued by 25%.

The City created a multi-jurisdiction Tenant Harassment Prevention Task Force to investigate and bring enforcement actions – including criminal charges – against landlords who are found to be harassing tenants through illegal construction. In CD12, the Task Force has inspected 20 buildings with 570 apartments. Over 1,200 violations have been issued, and three buildings have ongoing cases in Housing Court initiated by HPD.

Strategy 6

Continue to improve housing quality through rigorous enforcement of the Housing Maintenance Code

HPD responds to 311 calls, Housing Court requests, and building referrals by community groups and elected officials by sending inspectors to see if building conditions violate the City's Housing Maintenance Code. If HPD finds such conditions, they issue violations, which require that the owner correct the condition. The most serious conditions must be corrected immediately, while less serious conditions must be corrected within 30 to 90 days. If owners do not correct violations, buildings may enter into one of HPD's enforcement programs.

Protect Tenants

Strategy 7

Provide free legal representation to Inwood tenants facing harassment

To support tenants who are facing eviction or harassment, the City has expanded funding for civil legal services for low-income New Yorkers at the Human Resources Administration's Office of Civil Justice.

Since 2015 to May 2018, City-funded legal services programs for tenants have assisted approximately 1,300 households in the Inwood zip code of 10034 providing legal assistance to approximately 3,300 Inwood residents facing displacement, eviction and harassment by unscrupulous landlords.

Strategy 8

Educate tenants about their rights and resources to prevent displacement

The City's Tenant Support Unit (TSU) uses a data-driven approach to engage and provide assistance to New Yorkers who may be at risk of displacement or experiencing harassment. Outreach specialists conduct door-to-door outreach to inform tenants of their rights, identify any housing-related issues, and connect them with a range of resources, such as emergency repairs or free legal assistance. From July 2015 to June 2018, TSU specialists have knocked on over 31,867 doors and assisted over 2,493 tenants in Inwood.



Preferential Rents

If you have a preferential rent on your rent stabilized apartment, it means the landlord is charging you less than what they are legally allowed to charge under the law. Your lease must include language that states you are being charged a preferential rent.

A preferential rent may be described as a lower rent, a temporary rent, etc. Look to see if a higher "legal rent" is written in the lease, in addition to the preferential rent. If in doubt, always ask before signing your lease.

The landlord may terminate the preferential rent upon renewal of your lease and charge the higher legal rent and any lawful increases. If a higher legal rent is not stated in the lease, then the preferential rent is the only rent on which future increases are allowed to be calculated.

When your lease ends, the landlord can terminate the preferential rent unless there is language in the lease that specifies that the preferential rent will continue for the entirety of your tenancy. If a lease does not include this language, the owner can still terminate the preferential rent at the end of the lease.

Remember, the higher legal rent must be specified in the lease. Preferential rents cannot be terminated during a lease term for any reason.

For more information, call the State's Rent Info line at 718-739-6400 or visit www.nyshcr.org/rent,



HPD Inspectors

Strategy 9

Include Inwood in the new Partners in Preservation initiative to develop comprehensive anti-displacement strategies for buildings at risk

HPD will include Inwood and Washington Heights in its new Partners in Preservation initiative to establish a hub for neighborhood-based anti-displacement initiatives. A core element of the program will include additional resources for community-based organizations to organize tenants and develop and implement action plans for at-risk buildings in close coordination with HPD and other partners.

7

Strategy 10

Establish a Certification of No Harassment (CONH) Pilot Program

CD12 has been included in the Certification of No Harassment (CONH) Pilot Program, the product of a collaborative, year-long working group between the Administration and City Council. When implemented later this year, it will require owners of certain covered buildings to obtain a certificate from HPD proving that they have not harassed tenants before they can apply for building permits to work in or demolish rent stabilized buildings.

02 Develop New Affordable Housing

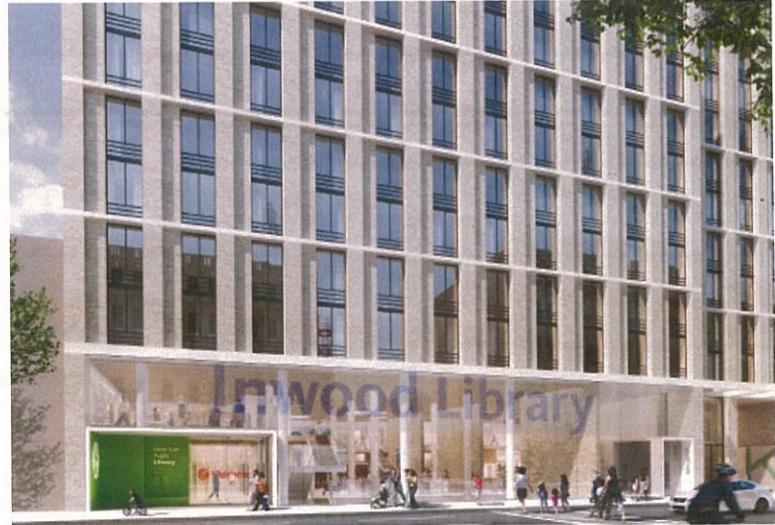
Protecting residents who want to remain in Inwood is HPD’s number one priority. However, to accommodate a growing population and ensure that a shortage of housing in Inwood does not drive rents even higher, we must ensure that the supply of housing also increases, and that any new housing includes permanent affordable homes.

Through the new Mandatory Inclusionary Housing Program (MIH), proposed land use changes could result in the creation of over 900 permanently affordable homes in Inwood. HPD is also working to prioritize the development of affordable housing and community amenities on publicly owned land throughout the neighborhood, such as the Inwood Library site. Lastly, a number of property owners within the Inwood area are already working with the City to finance affordable housing projects that exceed the minimum MIH requirements.

Strategy 1 Implement Mandatory Inclusionary Housing to require that all new residential development include permanently affordable homes

MIH requires developers to provide permanently affordable housing in new buildings whenever land is rezoned for increased or new residential development. By creating housing for people earning a range of incomes in every new building, MIH ensures that neighborhoods remain diverse as they grow.

Strategy 2



The Eliza

Prioritize the development of City-owned land with affordable housing

HPD has partnered with The New York Public Library (NYPL) to redevelop the Inwood Library site at 4790 Broadway. The project will result in the construction of a new, modern library branch combined with 175 permanently affordable apartments, Universal Pre-K classrooms, and community facility space. The City has selected a development team, led by Community League of the Heights (CLOTH), The Children’s Village, Ranger Properties, and Alembic Community Development, to construct and operate the new building.

Inwood stakeholders have also identified additional publicly owned sites that are currently in use by City agencies but may be appropriate for redevelopment with affordable housing. While many of these properties serve critical community functions, HPD is actively working with its partner agencies to evaluate potential relocation and incorporation into new affordable housing development on-site.

Strategy 3

Offer financing to incentivize the development of affordable housing that exceeds minimum MIH requirements

A number of property owners within the Inwood area are working with the City to finance affordable housing projects that exceed the minimum MIH requirements. Recognizing that these projects will require the continued partnership of private owners, they have the potential to generate over 1,000 additional affordable homes.

In response to community feedback, HPD recently updated the terms of its financing programs. The agency now requires a 10% set aside for homeless families and individuals in every project, and more homes for extremely low- and very low-income households. Any project in an MIH area receiving City subsidy must also now set aside an additional 15% of apartments as permanently affordable, on top of the baseline MIH requirements.

For more information about HPD's financing programs, including contact information for program managers, visit nyc.gov/development-programs.

Strategy 4

Support mission-driven groups interested in developing affordable housing on underutilized sites

Inwood residents and stakeholders expressed a desire to see more participation by mission-driven organizations in affordable housing development and preservation. To assist those interested in affordable housing, HPD will work with local faith-based organizations to explore development opportunities.



Recent Reforms to Requests for Proposals

HPD recently implemented new policy reforms to its Requests for Proposals (RFP), which include a preference for teams with community development plans and/or experience; recognition of development experience in rehabilitation; and the use of a remainder interest, which is a legal tool that gives the City ownership of the property at the end of the initial affordability period unless HPD and the owner agree on an extension of affordability.

HPD maintains a Pre-Qualified List of Owner's Representatives to help mission-driven organizations who may have underutilized land but little to no real estate experience. In creating the list, HPD evaluated each organization's technical expertise, experience, and capacity to represent owners in the development of affordable housing.

Additionally, HPD will implement recent RFP reforms for future public site RFPs in Inwood, including a new preference for community development plans and experience; recognition of development experience in rehabilitation; and the use of a remainder interest, which is a legal tool that gives the City ownership of the property at the end of the initial affordability period unless HPD and the owner agree on an extension.

Mandatory Inclusionary Housing Options

During the public review process, the City Council and the City Planning Commission (CPC) can choose to impose one or both of two basic options to apply to a rezoning:

25% Affordable Units

75% Market Rate

MIH Option 1: 25% of housing must serve households with incomes averaging to **\$56,000 (60% AMI)**

At least 10% of which must be at or below \$38,000 (40% AMI)

Examples:

# of Units ¹¹	AMI	Maximum Annual Income ¹⁰	Sample Rent ¹⁰
10	40% ⁹	\$37,560	\$810
5	60% ⁹	\$56,340	\$1,280
10	80% ⁹	\$75,120	\$1,820

# of Units	AMI	Maximum Annual Income ¹⁰	Sample Rent ¹⁰
10	40% ⁹	\$37,560	\$810
7	60% ⁹	\$56,340	\$1,280
8	80% ⁹	\$75,120	\$1,820

10

30% Affordable Units

60% Market Rate

MIH Option 2: 30% of housing must serve households with incomes averaging to **\$75,000 (80% AMI)**

Examples:

# of Units ¹¹	AMI	Maximum Annual Income ¹⁰	Sample Rent ¹⁰
10	30% ⁹	\$28,170	\$575
10	80% ⁹	\$75,120	\$1,820
10	130% ⁹	\$122,070	\$2,993

# of Units	AMI	Maximum Annual Income ¹⁰	Sample Rent ¹⁰
10	60% ⁹	\$56,340	\$1,280
10	80% ⁹	\$75,120	\$1,820
10	100% ⁹	\$93,900	\$2,289

In addition to the two basic options, City Council and CPC may add one or two other options:

20% Affordable Units

80% Market Rate

MIH Option 3: 20% of housing must serve households with incomes averaging to **\$38,000 (40% AMI)**

Subsidy is allowed only if more affordable housing is provided.

Examples:

# of Units ¹¹	AMI	Maximum Annual Income ¹⁰	Sample Rent ¹⁰
5	30% ⁹	\$28,170	\$575
10	40% ⁹	\$37,560	\$810
5	50% ⁹	\$46,950	\$1,045

# of Units	AMI	Maximum Annual Income ¹⁰	Sample Rent ¹⁰
16	30% ⁹	\$28,170	\$575
4	80% ⁹	\$75,120	\$1,820

Draft Inwood Housing Plan

30% Affordable Units

60% Market Rate

MIH Option 4: 30% of housing must serve households with incomes averaging to **\$107,000 (115% AMI)**

At least 5% at 70% AMI and 5% at 90% AMI No subsidy, and has a 10-year sunset

Example:

# of Units ¹¹	AMI	Maximum Annual Income ¹⁰	Sample Rent ¹⁰
5	70% ⁹	\$63,730	\$1,602
5	90% ⁹	\$84,510	\$2,061
20	130% ⁹	\$122,070	\$2,993

02 Develop New Affordable Housing

⁹ Developers can provide a range of low to moderate income tiers, if rents of the affordable units achieve the required average AMI.

¹⁰ Rents and incomes are examples based on a three-person household, and two-bedroom sample rents and 2018 HUD Income Limits.

¹¹ Sample unit distribution based on a 100-unit building

03 Increase Access to Affordable Housing

Over the last several years, HPD has worked with community partners to better understand the needs of affordable housing applicants and made improvements to the overall application process.

HPD is committed to continually improving access to affordable housing, such as by making it easier for residents to complete the application process, better advertising open lotteries, and refining marketing guidelines to qualify a broader range of applicants.

Strategy 1

Refine marketing guidelines to reach New Yorkers most in need

HPD is working to remove barriers to qualifying for affordable housing. In June 2018, HPD updated the affordable housing Marketing Handbook to strengthen the City's policies and procedures for allocating affordable housing through NYC Housing Connect lotteries. These policy changes make affordable housing more accessible to New Yorkers who would have otherwise been previously disqualified, and include:

- Limiting options to reject applicants based on credit history and debt and ensuring that applicants can no longer be punished for taking their landlords to court.
- Clarifying eligibility guidelines for a speedier review process by eliminating mandatory employment history requirement for self-employment and freelance income.
- Introducing additional protections for domestic violence survivors, such as ensuring applicants cannot be denied



Recruiting Housing Ambassadors

Housing Ambassadors are community-based organizations and service providers, trained by HPD, who help people prepare and apply for affordable housing. HPD is recruiting more organizations to serve as Housing Ambassadors in Inwood and throughout the city.

If you know of a group that might be interested in becoming a Housing Ambassador, please contact ambassadors@hpd.nyc.gov.

Visit nyc.gov/housing-ambassadors for a list of current Housing Ambassadors and their contact information.

housing for adverse factors, such as poor credit or negative debt payment history, if those factors are a direct result of domestic violence, dating violence, sexual assault, or stalking.

Strategy 2

Make it easier for residents to understand, prepare for, and complete the affordable housing application process

HPD recognizes that the affordable housing application process can be time-consuming, and we continue to take steps to help residents become better prepared to submit complete and accurate applications. HPD already has several initiatives underway:

- HPD's [Housing Ambassadors Program](#) trains local community groups to provide free technical assistance to residents who wish to apply for affordable housing.

Strategy 3

Better advertise open housing lotteries

Community groups and elected officials can be alerted to open lotteries and help spread the word to their constituents. If you are an organization interested in receiving notifications for open lotteries, you can sign up on Housing Connect. HPD also advertises the lotteries on Facebook and Twitter ([@NYCHousing](#)).

In addition to digital notifications, developers are required to advertise open lotteries at the construction site. The Department of Buildings requires developers to post a phone number that interested applicants can call in order to be placed on an inquiry list. Once the lottery is open, HPD requires the developer to post the marketing on the construction site and alert

all applicants on the inquiry list. Instructions on how to apply online or receive a paper application in the mail are also provided in seven languages. HPD continues to explore ways to improve language access for advertisements and is open to community suggestions.



Ensuring Fair and Equal Opportunity

Developers creating City-sponsored affordable housing are required to follow HPD/HDC marketing and tenant selection guidelines and procedures to ensure that the process is fair and provides equal opportunity to all applicants, regardless of race, color, religion, gender, sexual orientation, gender identity or expression, national origin, age, genetic information, disability, or veteran status. In addition, the process should affirmatively further fair housing by promoting racial, ethnic, income, and geographic diversity among residents and within the neighborhood, and by prioritizing applicants with mobility, vision, or hearing disabilities who require accessible/adaptable design.

HPD or HDC must approve each developer's plan to advertise and market available affordable apartments. If marketing plans are found to be insufficient or do not follow the rules for fair

housing marketing, the agency will require the developer to modify.

Please refer questions or issues related to the marketing process directly to HPD at hpdcpliance@hpd.nyc.gov.

Please note that individuals wishing to appeal a lottery rejection must follow the instructions on the rejection letter, which specifies whom to contact and how.

04 Promote Economic Opportunity

HPD shares the goal of leveraging affordable housing investment to promote economic opportunity in Inwood. There are a number of local economic development initiatives that HPD has implemented under this Administration:

Strategy 1

Expand local hiring incentives in HPD-financed developments

In all RFPs for the development of City-owned property, respondents must demonstrate a plan for outreach to Inwood residents related to employment opportunities generated by the project.

HPD is also connecting Inwood residents to good jobs in the building trades. The HireNYC program requires that any housing development receiving \$2 million or more in HPD subsidy post open positions with the Workforce1 system and consider qualified candidates.

Strategy 2

Expand opportunities for Minority and Women-Owned Business Enterprises (M/WBEs) in the affordable housing development industry

HPD is committed to promoting the participation of M/WBEs and non-profit organizations in the development and management of City-subsidized affordable housing.

Through the Building Opportunity Initiative, HPD seeks to:

- Build the capacity of M/WBE and non-profit developers through professional development, networking, and mentoring

programs. The Building Capacity Workshop Series introduces M/WBE and non-profit developers to best practices in affordable housing development, from site selection and project financing to construction and property management.

- M/WBE Build Up Program., which launched in 2017, requires developers of projects where HPD contributes \$2 million or more in subsidy to spend at least a quarter of all HPD-supported costs on certified M/WBE construction, design, or professional service firms.

Track and Report

14

HPD is committed to regularly reviewing and reporting on the changing needs in Inwood to test how our strategies are being implemented and evaluate whether the fine-tuning of programs and policies may be required. In coordination with the Mayor's Office of Operations, HPD will submit annual progress reports on the strategies outlined in the Inwood Housing Plan, as well as overall housing development and preservation activity in community.

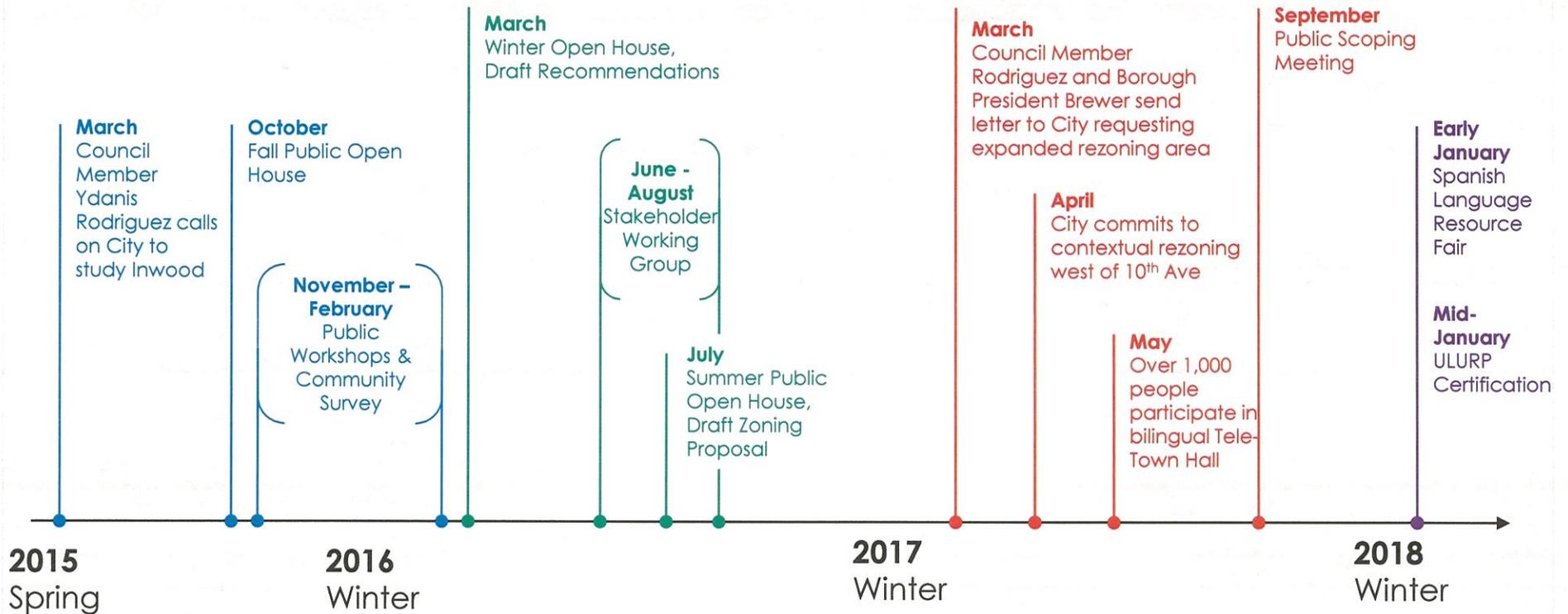


INWOOD NYC NEIGHBORHOOD PLAN

CITY COUNCIL
PUBLIC HEARING
JULY 10, 2018

What is Inwood NYC?

Since Spring 2015, the City has engaged with over 3,000 local stakeholders



Responding to Community Feedback

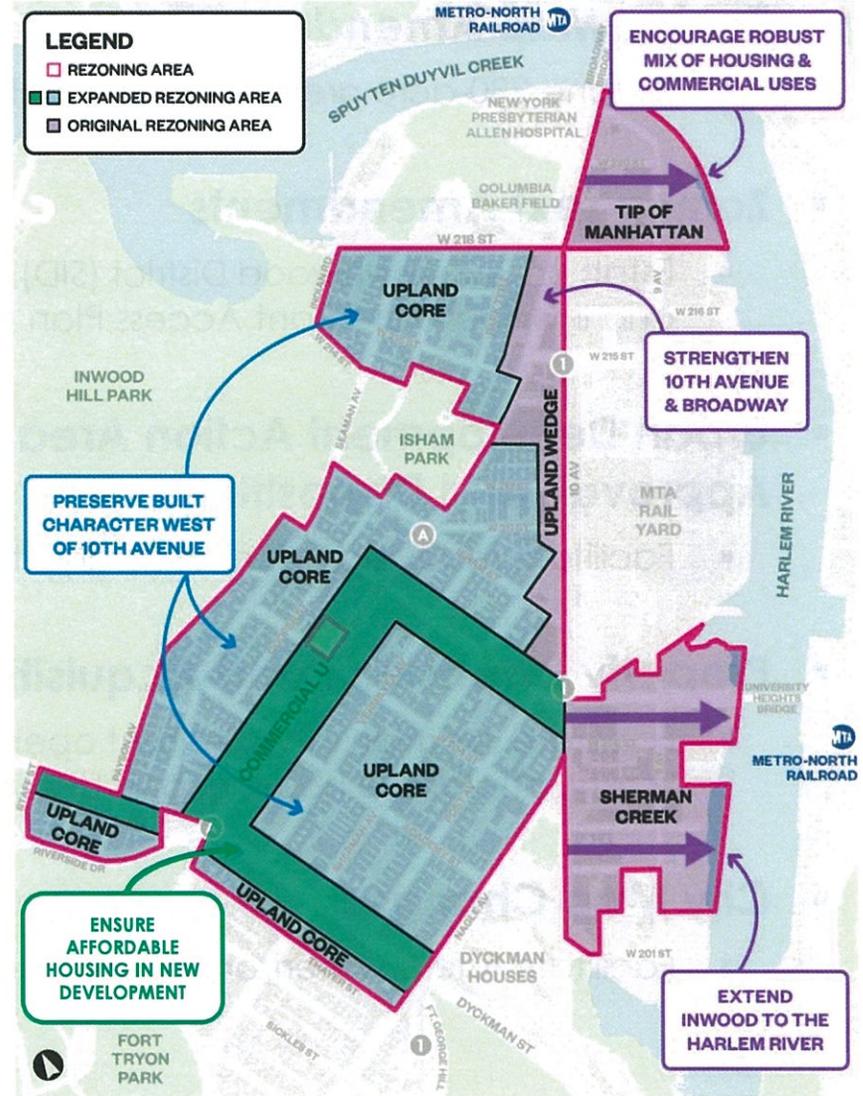
The rezoning area was expanded based on feedback from the community

Along and East of Tenth Ave:

- Extend the **vibrant mixed-use character** of Inwood **east to the Harlem River**
- **Require permanently affordable housing**

West of Tenth Ave:

- Strengthen the existing character with focus on **preservation**
 - **80% of the expanded rezoning area proposed for R7A contextual zoning**



Proposed Land Use Actions

▪ Zoning Map Amendments

- Rezone 230-acre area in Inwood, balancing new development and preservation

▪ Zoning Text Amendments

- Establish Special Inwood District (SID), Mandatory Inclusionary Housing Area (MIHA), and Inwood Waterfront Access Plan (WAP)

▪ Urban Development Action Area Designation and Project (UDAAP) Approval, and Disposition

- Facilitate redevelopment of library site with new library, affordable housing, and UPK

▪ Property Disposition and Acquisition

- Facilitate creation of waterfront open space; redevelopment of library site with new library, affordable housing, and UPK; reconfigure City parcel in Tip of Manhattan

▪ City Map Changes

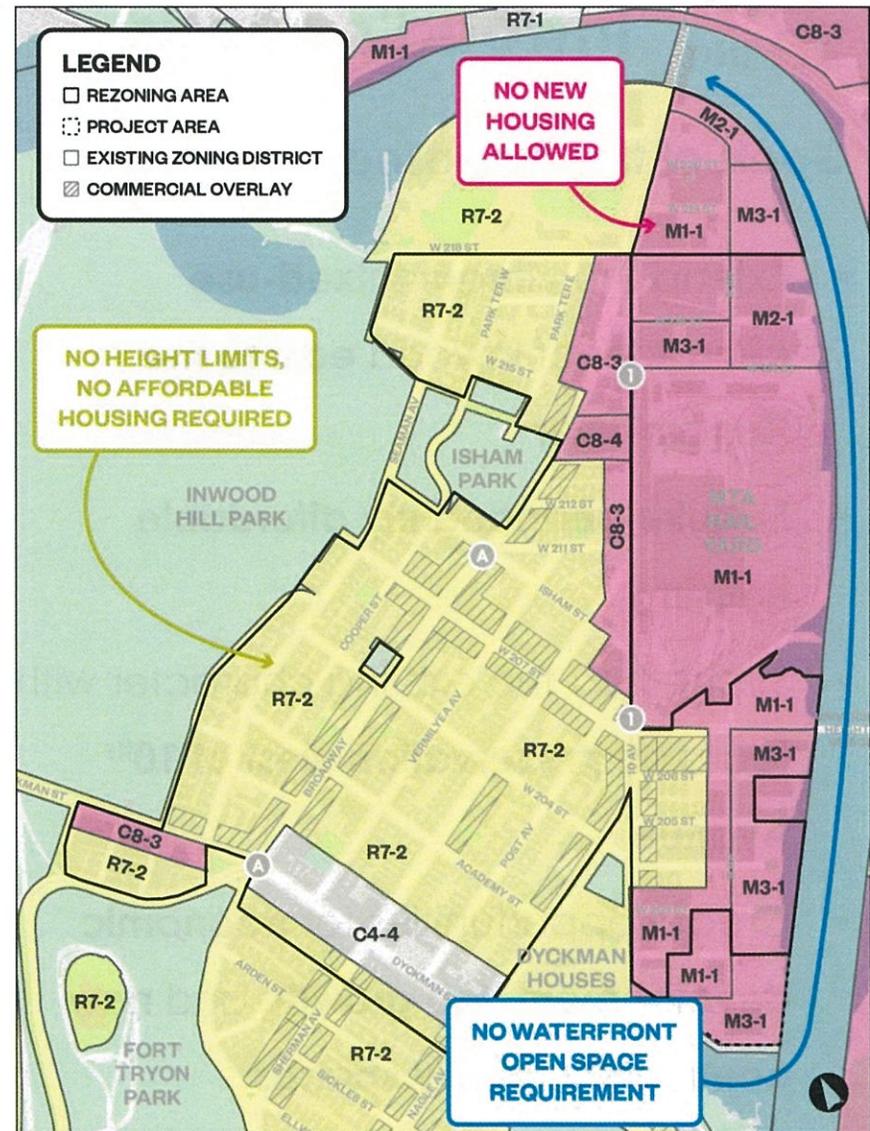
- Facilitate future waterfront open space

Why does Inwood need updated zoning?

Existing Zoning is a barrier

- Zoning has not been updated in over half a century
- Large parts of the neighborhood **do not allow new housing** and **affordable housing is not required** anywhere
- Because of **lack of height limits**, new development could erode existing character west of Tenth
- **No mechanism to ensure access** to the **waterfront**

Updated zoning will create a long-term framework for Inwood's growth

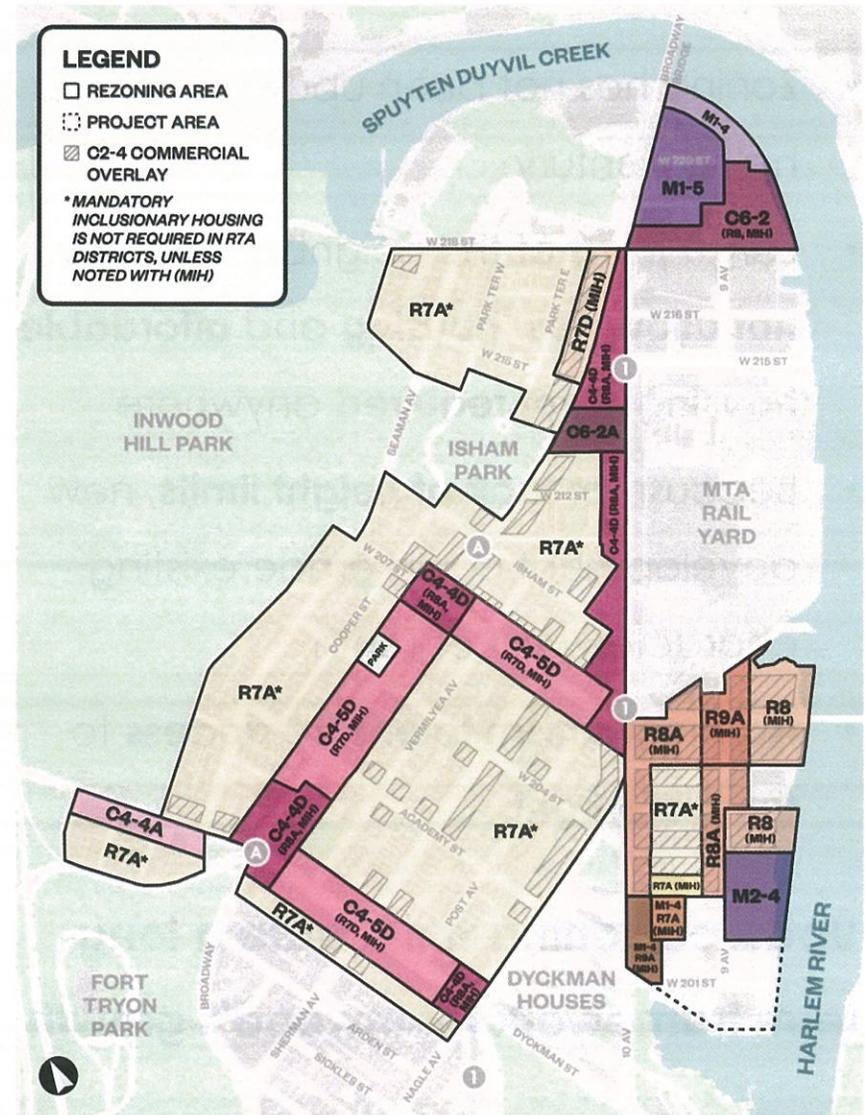




The Proposed Land Use Actions aim to address Inwood's needs

Goals of the Proposed Zoning

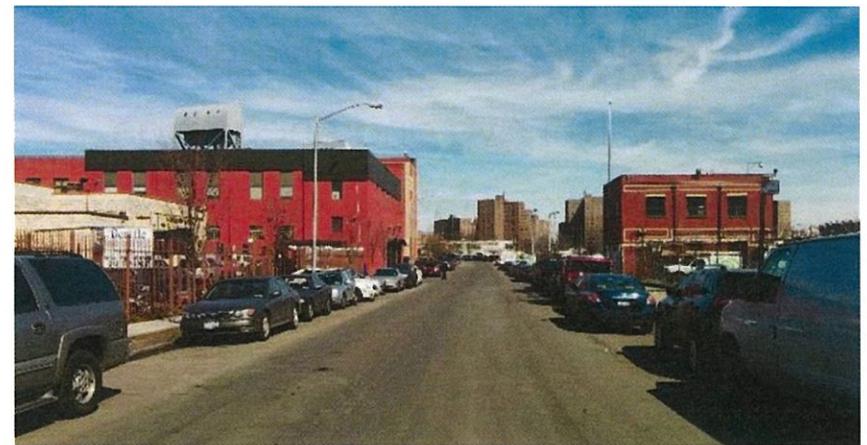
- Extend the **vibrant mixed-use character** of Inwood **east to the Harlem River**
- **Require permanently affordable housing**
- Strengthen the existing character with focus on **preservation west of 10th Avenue**
- Create opportunities for **economic development, job growth, and new community facility spaces**





The proposed land use actions are needed to ensure new permanently affordable homes are built in Inwood

- Proposed zoning allows **Mandatory Inclusionary Housing (MIH)** to be mapped in some areas, **requiring permanently affordable housing**
- Library project would create **175 deeply affordable homes** along with state-of-the-art library and UPK





The proposed land use actions are needed to encourage an active public realm and waterfront

- Mixed-use zoning and tailored Waterfront Access Plan to **extend Inwood to the waterfront** and **require public open space**
- **Active uses required on major streets** to reinforce active streets west of 10th Ave and encourage **activity** and **safety** east of 10th Ave





The proposed land use actions are needed to unlock opportunities for job-intensive uses

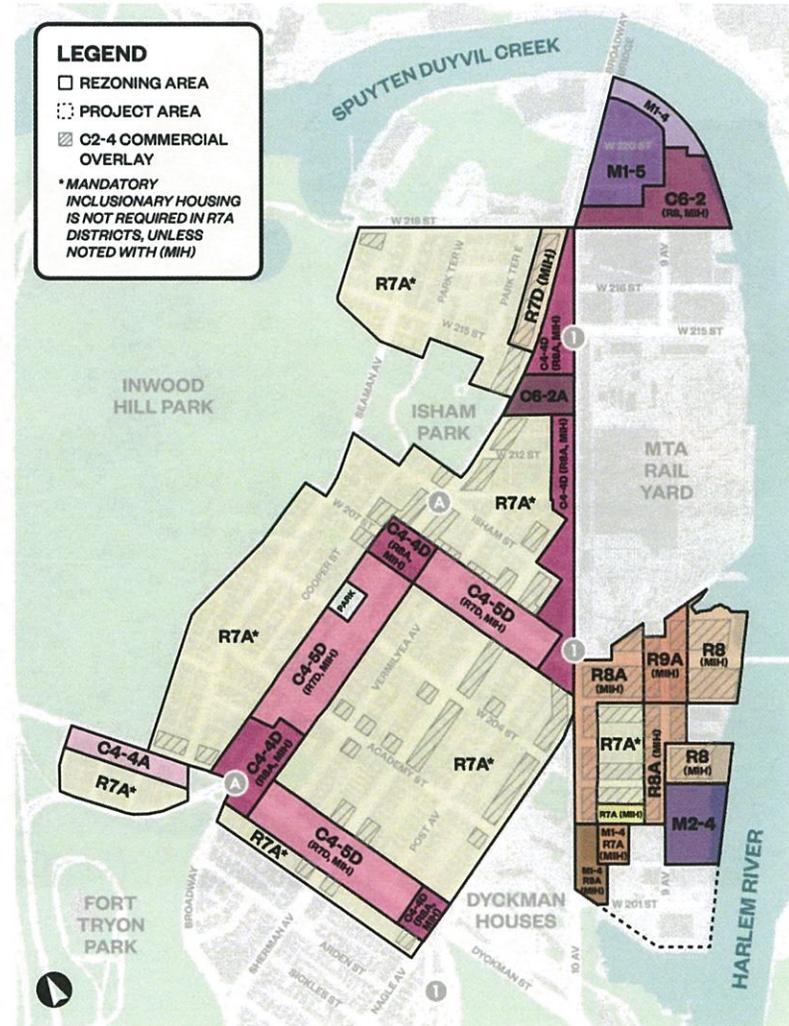
- Mixed-use zoning will encourage **commercial and community facility uses** along with residential
- Proposed zoning will encourage **job-intensive commercial and community facility uses**
- Commercial overlays will ensure **existing retail can expand** and **new commercial is encouraged on the first two floors**



CPC Modifications

In June, CPC made modifications to the proposed zoning that improved the application and further responded to community feedback

- Require a wider shore public walkway in southern portion of Tip of Manhattan
- Ensure publicly accessible waterfront open space is provided on future Tip of MN city site regardless of future configuration
- Per MTA's recommendation, remove Inwood Library site from Transit Easement Zone
- Permit self-storage as-of-right in C6-2A in Upland Wedge
- Make ground floor regulations more flexible in certain portions of Sherman Creek



The Future of Inwood

Conceptual rendering of Academy Street looking West



Good afternoon **Chair Moya, Council Member Rodríguez,** and **members of the City Council Subcommittee on Zoning.**

My name is **James Patchett,** and I am the **president and CEO** of the **New York City Economic Development Corporation,** known as **EDC.**

Here with me this morning to provide testimony are **Maria Torres-Springer, Commissioner of the Department of Housing, Preservation and Development,** and **Gregg Bishop, Commissioner of the Department of Small Business Services.** We are also joined today by colleagues from **five partner agencies** who have been working with EDC in implementing the **Inwood NYC neighborhood plan.** I would also like to recognize **Manhattan Community Board 12** and **Borough President Gale Brewer,** who have worked **tirelessly** to ensure that community voices were heard throughout this process. We are grateful for their continued advocacy and pushing the City to do better for the Inwood community.

We appreciate the opportunity to discuss **Inwood NYC** this afternoon. After speaking with **thousands** of residents through the over-three year bilingual planning process, **one thing is clear: Inwood is truly a beloved neighborhood.** Located between **Inwood Hill Park,** a 200-acre jewel on the Hudson, and the **Harlem River,** the area is home to **over 40,000 residents.** **Half** of these residents are **foreign-born,** and **more than 75 percent** of the population identifies as **Hispanic or Latino.** With one of the highest concentration of Dominican residents in the five boroughs, Inwood is one of the ethnic enclaves that make New York **the most diverse and dynamic city in the world.** The

area also has amenities and character that has attracted families for generations: a **distinctive neighborhood fabric, one of the largest stocks of rent-stabilized housing in the city, good transit access, ample green space, and delicious food.**

But despite Inwood's many positive attributes, it has also experienced a **number of challenges** that call for **immediate action.** The area's **unemployment rate** remains **higher** than the citywide average, and rents are increasing **faster** than those in other neighborhoods. **Together,** these factors threaten Inwood as a haven for immigrants and working families.

Council Member Rodriguez has eloquently described his vision for connecting residents of **Inwood** and **Northern Manhattan** with the **21st-century economy.** **Today,** residents are being left behind because they lack the right preparation for and awareness of **STEM careers, especially in health care and technology.** This plan will change that through a **comprehensive** and **innovative** set of investments in STEM programming throughout the neighborhood.

Inwood's affordable housing is one of its greatest assets, but this asset has not been replenished over time. Only **200 units** of housing have been built in the **past two decades.** This plan will keep Inwood affordable by significantly expanding the stock of affordable homes for the first time in generations. **Of course,** our first priority is to protect Inwood tenants. For the **last several years** we have been taking aggressive action to **preserve existing affordable housing** and **protect tenants from harassment,** and these efforts **will continue** long after the rezoning is complete.

Another challenge facing Inwood is **infrastructure**. Through our dialogue with the Inwood community, we have frequently heard concerns that the City has not made sufficient investments in local infrastructure such as **streets, sewers, parks, and community facilities**. **In response**, we are working with **Council Member Rodríguez** to define a set of transformative public investments that will enhance quality of life for decades to come.

Given these realities, creating a **comprehensive plan** for Inwood's future has been a community priority for years. Our sense of urgency was heightened following **Council Member Rodríguez' call to action** for the neighborhood **three years ago**. This timing also coincided with the start of **Housing New York**, Mayor De Blasio's plan to build and preserve hundreds of thousands of affordable homes throughout the city. This created a **unique opportunity** to conduct **comprehensive neighborhood studies** throughout the five boroughs, including in Inwood.

The Inwood NYC plan before you today outlines a number of **key steps and strategies** to keep the neighborhood **affordable** and **attractive** for immigrants and working families.

While the application before the Council is specific to zoning and land use, this is **just one** of the tools we are deploying to meet our objectives. Inwood residents need existing affordable housing to stay affordable **as well as more opportunities** for affordable homes so that families can stay in this wonderful neighborhood.

They also seek **new and improved open space** and **access to the waterfront; job training and career opportunities; support for local small businesses and the arts and cultural scene;**

better community services; and significant infrastructure investments. All of these pressing needs are addressed through the multiagency effort we call **Inwood NYC**.

ZONING + HOUSING

Zoning in Inwood has been **frozen in time**. The last zoning update was made in **1961**, the same year John F. Kennedy became president. This zoning has created **two Inwoods**. One is **west of 10th Avenue** and has lively commercial corridors and charming built character, but no zoning height limits or mandate for affordable housing. The other is **along and east of 10th Avenue**, where zoning mostly does not permit any new housing and limits the potential for commercial and community facility uses. **Today**, these areas are defined by **over 10 acres of parking lots, unattractive streetscapes, and a lack of access to the Harlem River waterfront**. This cuts residents off from the Harlem River, which should be a valuable asset.

Today's rezoning proposal has been shaped by **years** of planning and waterfront studies conducted by the city and the community under the leadership of Community Board 12 and Council Member Rodríguez. The land use application under review seeks to address **several key priorities** we learned throughout the process: **preserving Inwood's distinctive character, especially that of the existing residential community west of 10th Avenue; extending the neighborhood's vibrant, mixed-use character to a restored and revitalized public waterfront; and creating opportunities for thousands of new homes**, including the first significant expansion of Inwood's affordable housing stock in decades.

All of these objectives seek to **strike a balance between preserving the neighborhood character and creating much-needed affordable housing, commercial, and community facility space.**

The land use actions before you reflect this goal. The proposed zoning would facilitate the creation of **over 4,000 new homes**, including **over 900 permanently affordable homes on privately owned sites through the Mandatory Inclusionary Housing program.** By applying the MIH program, we will ensure that all new housing in upzoned areas comes with permanently affordable housing. While we acknowledge we **must** go further to meet the acute affordability needs of Inwood, this action is an important catalyst.

To that end, we are using City-owned land to create more affordable housing and meet other community needs. Through a partnership with **New York Public Library**, we will build a **state-of-the-art new library, Universal Pre-K space, and 175 deeply affordable homes** on the site of the existing Inwood branch library. I am also pleased to announce today that the City will develop **hundreds of affordable homes and waterfront open space on a City-owned site** in the northern part of Inwood.

Together, these projects will significantly expand Inwood's affordable housing stock for the first time in decades. We are also working with private property owners to incentivize the creation of hundreds of affordable homes on non-city owned sites.

Perhaps most importantly, the City is taking **strong and immediate action** to preserve Inwood's existing affordable housing and protect tenants from harassment. **In late 2016**, the

City funded the opening of a **new Inwood office of Legal Services NYC** in order to bring these services closer to local tenants. We are also launching a pilot of the **Certification of No Harassment program** in Inwood. My colleague **Maria Torres-Springer** will elaborate on these efforts in her testimony.

Next, I want to emphasize that this rezoning proposal has **changed and evolved in response to community feedback**. In response to feedback from **Community Board 12, local groups, and elected officials**, we **expanded** the rezoning from a much more targeted proposal focused exclusively on the **Harlem River waterfront** to a **more comprehensive approach** that encompasses the **entire neighborhood** and **balances sustainable growth** with preservation of Inwood's distinctive built character. We also filed an amended land use application in April that **directly responds** to feedback from CB 12 and other participants in the ULURP process. My EDC colleague **Cecilia Kushner** will describe these changes to the proposal in more detail following my remarks.

We are **also** using zoning as a tool to encourage the construction of new commercial and community facility space. We heard from community a desire for **more** opportunities for businesses and nonprofit organizations to locate and expand in Inwood as well as a desire for more indoor community spaces. Longstanding ground-floor shops that currently do not conform with zoning would be made conforming. We are **also** making a concerted effort to promote the future growth of institutions and industries like health care, which offer good jobs at a range of education levels. **Overall**, the rezoning would create the potential for **approximately 1.5 million square feet of commercial and**

community facility space over and above what zoning currently allows, with **over 4,500 jobs** associated with that new space.

There is **one more aspect** of the rezoning proposal that I'd like to highlight. Through a tool called a **Waterfront Access Plan**, we are creating a framework for public and private investments that will eventually create over one mile of restored public waterfront esplanades and open spaces along the Harlem River, an action that is long overdue.

Under zoning, all mixed-use development on waterfront sites will be required to **build** and **maintain** public open space. At the North Cove, which today is a much-loved informal community space and bird habitat, and at Academy Street on Sherman Creek near NYCHA's Dyckman Houses campus, we are **de-mapping unused streets** as a first step toward potential future investments in new public open spaces.

These actions will help the Inwood community realize a **long-held desire** to **improve** and **gain access** to the incredible waterfront resource in their backyard.

NON-ZONING ASPECTS OF THE PROJECT

In addition to implementing zoning changes, the effort to plan for Inwood's future is focused on providing the community **with much-needed infrastructure and programming investments**. These initiatives ensure that **current needs are met** while **laying a foundation for sustainable growth**. I'd like to briefly talk about this vision and some of the early actions the City has already taken to deliver on the goals of **Inwood NYC**.

An aspect of this plan that I am particularly excited about is economic development and access to opportunity. With leadership and direction from Council Member Rodriguez, we are excited to leverage the momentum of our collective efforts to put forth a strong economic development vision for Inwood – one that seeks to give Inwood residents the tools to participate in our rapidly-changing 21st century economy. **Our vision has three main components: A neighborhood-wide initiative to make STEM fields exciting and accessible to Inwood youth; workforce investments to connect working-age residents with good jobs in growing industries like health care and technology; and expanding awareness of STEM and technology throughout the community.**

Expanding access to opportunity **must** start with education. Our vision for Inwood is to provide **as many on-ramps as possible** for students at every age to get excited about STEM, be exposed to careers, and learn the foundational and applied skills needed to be ready for further pursuit of STEM in their postsecondary education.

We think the most effective way to do this is to create a network of sites throughout the community where youth can access programming, so that no student is ever far away from the opportunity to participate with STEM learning.

To that end, we are adding programming in District 6 schools, which serve the Inwood community, to give students the tools they need for 21st century careers. We are working with **DOE** to expand **Algebra for All, Computer Science for All, and existing literacy programs in schools**, to ensure that Inwood youth are starting from a strong foundation. We are also

exploring ways to work with **innovative programming partners in the nonprofit sector and higher education** to drive further collaboration between Inwood schools and these partners. One example of a potential partnership is at the **George Washington Educational Campus**, where **Council Member Rodríguez** has highlighted an exciting opportunity to create a **STEM education hub** serving youth from all over the neighborhood. **Another** is the potential for a new multidisciplinary degree program combining **electrical engineering, computer science, and related fields**. The president of **City College of New York, Vincent Boudreau**, is here today to talk more about this opportunity.

Regardless of what the economy looks like in the coming years, these fundamental skills are **critical** for adapting to a changing world.

For working-age residents, addressing this challenge involves addressing unemployment and underemployment **head on**, and connecting Inwood residents with stable, good-paying jobs, particularly in rapidly growing fields like healthcare and tech.

In 2016, the City opened a **new Northern Manhattan Workforce1 Center** to bring workforce services closer to the residents of Inwood and Washington Heights. This center provides a new set of culturally-relevant services known as the **Global Talent Pipeline** aimed at the needs and strengths of foreign-born workers, and focuses on jobs in healthcare and tech. **Recently**, in partnership with **Council Member Rodríguez, New York Alliance for Careers in Health Care, and New York-Presbyterian Hospital**, we have been working to strengthen the pipeline connecting local residents with jobs at the **Allen Hospital in Inwood, the Columbia-Presbyterian main campus in**

Washington Heights, as well as other renowned medical institutions in Northern Manhattan. In a few minutes, my colleague **Gregg Bishop** will explain more about how we are creating stronger pathways to good-paying jobs. By implementing these programs, we are working to ensure community residents are **ready** for continued economic shifts, and see this moment as an opportunity rather than a threat.

Beyond education and workforce on-ramps, we are finding ways to engage the larger community in STEM and technology.

In May, the City announced that Inwood would be the second location for the neighborhood **Co-Lab program** run out of the **Mayor's Office of the Chief Technology Officer**. Through the Co-Lab, the City will work with Inwood leaders to get the community excited and talking about technology by identifying specific neighborhood challenges that the community wants to solve, and challenging the community and industry to find innovative technology solutions.

This model has worked well in **Brownsville, Brooklyn** and we are excited to bring it to **Inwood** – to show people that technology can be a force for good and used to make their lives demonstrably better. By creating on-ramps through education, workforce, and community programming, we hope to make STEM **pervasive** in Inwood. Another aspect of our economic development strategy is support for Inwood's **vibrant** small businesses and commercial corridors. Through the **Neighborhood 360°** program, the City has invested **over \$1 million** in grants to local organizations for projects like a local marketing campaign, extra sanitation services, and free

workshops to assist business owners and entrepreneurs with **leases, access to capital, and starting a new business.** Recognizing that Inwood's diverse culture is an underutilized asset, we have also provided funding and training to local arts organizations to help support their work. **Commissioner Bishop** and staff from the **Department of Cultural Affairs** are here to talk about those efforts.

Finally, we believe that a comprehensive plan for Inwood must include a **robust set of capital investments in infrastructure.**

Here again, the City is already taking action. DOT is rehabilitating the Broadway Bridge and implementing pedestrian and bike improvements to make it easier and safer to get around the neighborhood. We are developing a drainage plan to guide future investments in water and sewer infrastructure, while DEP and DDC carry out a sewer upgrade project in the northern part of Inwood.

We are **also** making major investments in the neighborhood's great parks, **large and small.** The Parks Department has recently committed **over \$15 million** to **renovate the Inwood Nature Center, restore the Dyckman Farmhouse, and other worthy projects.** Just to the **south of Inwood,** the City is making a **transformative \$30 million investment** in Highbridge Park through the Anchor Parks program.

Today, I'd like to highlight **two additional commitments** that we have been able to secure. The City will invest **\$15 million** to bring waterfront infrastructure on the Hudson River in the vicinity of Dyckman Street into a state of good repair, **including two piers and a floating dock that allow community groups and**

residents to access this wonderful natural resource. We have also identified funding to **restore** and **provide** public access to the historic **High Bridge Water Tower** in **Highbridge Park**. Colleagues from the agencies are here to answer your questions.

Going forward, we are working with **Council Member Rodríguez** to finalize a list of additional capital investments that will deliver on the ambitious goals of this plan. **We look forward** to sharing more details in the coming weeks.

In closing, this plan is not just about zoning. It's about bringing all the City's tools to bear to address the urgent needs of a diverse and vibrant community. It's about ensuring that all Inwood residents continue to have access to **economic opportunity, affordable homes, and good quality of life in a diverse and equitable neighborhood**. It's about making sure that Inwood remains what it has always been: a haven for immigrants and working families.

Thank you for your time and consideration. Cecilia will now give a brief presentation on the rezoning proposal. I am happy to answer any questions you may have following my colleagues' remarks.



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Gale A. Brewer, Borough President

July 10, 2018

Testimony of Manhattan Borough President Gale A. Brewer to the City Council Subcommittee on Zoning and Franchises on the Special Inwood District Rezoning: L.U. Items 135-2018 -- 140-2018 (ULURP Application Nos. C 180205 ZRM, C 180204 ZMM, C 180206 PPM, C 180207 PQM, C 180208 HAM

Good afternoon Chair Moya, members of the Subcommittee on Zoning and Franchises and Council Member Rodriguez.

The City's rezoning proposal has generated enormous concerns and fears among Inwood residents, many of whom are at income levels below the city's average and many of whom are immigrants, and they are worried that this rezoning proposal will either cause or hasten gentrification.

These concerns are justified. Inwood has the highest concentration of rent regulated apartments in Manhattan and about 30 percent of those apartments are subject to preferential rents -- meaning that at any time a tenant can get a large rent increase that they may not be able to afford. Inwood has a "downtown strip," known as the Commercial U, that is reminiscent of a neighborhood's Main Street. And, unlike in other parts of the city, in Inwood, gentrification is happening rapidly not through development, but through the attrition of affordable housing and the influx of newer residents searching for more affordable Manhattan rents. So if we are going to encourage significant new development we have an obligation to ensure that our plans address these issues -- now and as well as in the long term.

The argument for accepting this plan as-is, is that if we do nothing, at some point the huge number of preferential rents will increase, making these units unaffordable; rent stabilized apartments will be lost to decontrol; local businesses will be forced out by high rents; and all this will occur without the construction of any new permanent affordable housing. But you cannot expect a neighborhood to

accept a rezoning that raises the specter of displacement in the short and medium term by telling the community it is not nearly as bad as what is likely to happen in the longer term. The current plan needs to be sufficiently revamped so that there are more shorter and medium term “plusses” to the community.

To that end, the Council must secure commitments from the Administration to change the plan to better achieve four goals:

- (1) Create significantly more new affordable housing, with more of it at rents the average current Inwood resident can afford;
- (2) Identify and fund programs to allow current tenants to remain in their homes;
- (3) Provide help – including small retail space -- for local businesses to remain in the community; and
- (4) Provide opportunities for local businesses, employment, and cultural resources to maintain Inwood's diversity and local character.

In my recommendation I set out ideas for revamping the plan to help achieve these goals. The highlights of those changes are as follows:

In the area of small business preservation:

First, do not re-zone the Commercial “U” (with the exception of the rezoning area on Broadway beginning at Block 2233, Lot 13 to West 204th Street so that the Library project can proceed). Any rezoning of the remainder of the Commercial U should be delayed until the other rezoning actions have generated 50 percent of the DEIS-projected commercial floor area. During this period, EDC and SBS should be required to develop and fund Inwood- specific programs that work with small businesses and developers of new retail space and provide relocation and financial assistance where necessary.

Second, as part of the effort to help local business remain, include zoning text that would limit store frontages to 40 feet and bank frontages to 25 feet and require a minimum number of stores in certain zoning lots, similar to what was implemented on the Upper West Side. This would help ensure that neighborhood retail space retains the local character of Inwood’s business community, and it would provide space for relocation or return of displaced local businesses.

Third, implement the plan I have fought for to relocate the warehouse businesses to the newly proposed M1-4 district in Sherman Creek;

Fourth, make every effort to relocate the automotive repair businesses to a concentrated area in Inwood or the immediately surrounding areas as is being done with the wholesale businesses. If this is not feasible, the City must consider including language in the special district text that would allow automotive repair businesses below residential development wherever practicable;

In the area of new affordable housing:

Use the city-owned lot currently occupied by the DOT at Sherman Creek between 205th and 206th streets for 100 percent affordable housing which would yield about 500 units;

Use the city-owned land located currently occupied by Charter Communications for its service vehicles in the Tip of Manhattan subdistrict, for a 100 percent affordable housing development which could result in another 500 units of affordable housing;

Make every effort to acquire the federally owned site at 5051 Broadway for another 100 percent affordable housing project.

Proceed with the Inwood Library Project and its 175 units of permanently affordable housing by announcing the selection of a “brick and mortar,” centrally-located, and fully-accessible location for an interim library with the same hours and services as the current library;

Make a good faith effort to include the car wash site adjacent to the Inwood Library into the project so that more affordable housing may be created.

Combine Option One under MIH with the Deep Affordability option to require that 20 percent of the residential floor area to be dedicated to housing for residents with incomes averaging 40 percent AMI; this step will make significantly more units affordable to the current average Inwood resident;

In the area of housing preservation:

In addition to funding the Right to Counsel program and including Inwood in the Certificate of No Harassment Program, the plan should include \$7.5 million annually for Inwood-targeted programs, including: additional legal services to ensure that every rent stabilized tenant with a harassment, eviction or preferential rent legal problem has access to counsel; and a tenant organizing and affirmative litigation program to find and address stabilized apartments with unlawfully registered rents.

Provide expense and capital funding for Dyckman Houses, whose residents will be impacted by the rezoning.

Finally, in the area of preservation of historic and cultural resources:

Preserve and commemorate significant historic sites in Inwood including Native American Burial and artifact sites and African slave burial sites; and

Provide art and cultural performance space and artistic workspace to support Inwood's thriving artistic community.

Without these changes, the plan will offer inadequate protections and benefits to the current residents and businesses of Inwood; making these changes will move the plan significantly toward the goals expressed by residents and business owners my office has heard from over the last two years.

TESTIMONY BY
COMMISSIONER GREGG BISHOP
NEW YORK CITY
DEPARTMENT OF SMALL BUSINESS SERVICES
BEFORE THE
NYC CITY COUNCIL
SUBCOMMITTEE ON ZONING AND FRANCHISES

TUESDAY, JULY 10th, 2018

Good afternoon Chair Moya, Council Member Rodriguez, and members of the Subcommittee on Zoning and Franchises. My name is Gregg Bishop and I am the Commissioner of the New York City Department of Small Business Services (“SBS”). At SBS, we aim to unlock economic potential by connecting New Yorkers to quality jobs, building stronger businesses, and fostering thriving neighborhoods. Over the last year, SBS has worked closely with our partner agencies, community-based organizations, businesses, and residents to implement new investments for small businesses and jobseekers in Inwood with the goal of increasing the economic security of local residents.

Chief among the new investments to-date is **Neighborhood 360°**, a program created to identify and develop commercial revitalization projects in partnership with local stakeholders. Through Neighborhood 360°, SBS worked with local community partners including the Washington Heights BID, Inwood Art Works, Northern Manhattan Arts and Culture and others, to conduct a **Commercial District Needs Assessment (CDNA)** that analyzed several local commercial corridors’ conditions and opportunities for improvements. Findings from the CDNA directly guided the priorities for the competitive **Neighborhood 360° Grant**, which resulted in SBS awarding \$1.14 million in funding over 3 years in early 2017. In partnership with several Inwood community-based organizations, the funding will provide direct resources to staff, plan, and implement customized commercial revitalization projects including direct business services, district marketing, supplemental sanitation services, and merchant organizing over the next three years.

The grant funding supports one-on-one small business consultation, advising, and community engagement activities and events. This includes the Film Works Alfresco free outdoor summer film series offered in Inwood Hill Park in both English and Spanish. In addition, our funding provides opportunities for local merchants to learn new skills in hospitality, customer service, and small business financing through free workshops taught by area professionals. These workshops are tailored around the needs and requests of Inwood small business owners.

SBS also provides free business services to small businesses in Inwood through the NYC Business Solutions Center located at 560 West 181st street. These free services help businesses start, operate and expand in New York City and include business education, access to capital, free legal resources and commercial lease review. SBS recently launched the **Commercial Lease Assistance Program**, which provides eligible businesses with pro-bono legal services to address commercial lease issues prior to litigation. Through the program, which can be accessed at the nearby NYC Business Solutions Center, our legal service providers can assist small businesses with signing a lease; renewing, amending, or terminating an existing lease; or resolving other commercial lease-related issues, such as landlord harassment, bad conditions, and breach of contract. All free for Inwood businesses.

We also heard from the Inwood community about their desire to increase quality employment and training opportunities for residents of Inwood. To address this, SBS will ensure access to Workforce1 training and recruitment services. SBS operates a network of 21 Workforce1 Career Centers across the city, including one currently located at 516 West 181st Street. The center's programming includes services designed

to provide the necessary support for foreign-born New Yorkers to be successful in growing industries in the New York City labor market. The Center focuses on providing integrated and customized services to help foreign born New Yorkers to effectively connect to job opportunities. Jobseekers can also receive support to connect to employment, connect to training and post-training employment, and develop skills to strengthen their job candidacy. The Center offers Occupational Training Programs, including Bilingual Medical Assistant Training; Commercial Driver's License Training; and Web Development Training. Additionally, SBS works with a network of over 300 workforce development community partners across the city to connect Inwood residents to quality employment and trainings.

SBS's healthcare industry partnership, the New York Alliance for Careers in Healthcare (NYACH) is also in conversations with New York Presbyterian Hospital to consider partnership opportunities to increase healthcare training and employment for Inwood residents.

In addition to our Chamber on the Go and Compliance Advisor teams, SBS also recently launched a mobile outreach unit. This is another way we are boosting our support to communities by bringing our services directly to business owners and jobseekers in their own neighborhoods allowing SBS to rapidly address their needs.

SBS is committed to serving the residents of Inwood and will continue to provide necessary services for the community's business owners and jobseekers. Thank you and I am happy to take your questions.



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NEW YORK CITY COUNCIL

**THE SUBCOMMITTEE ON ZONING AND FRANCHISES
DANITA NICHOLS CITY COUNCIL REZONING HEARING TESTIMONY**

July 10, 2018

Hello, I'm Danita Nichols, manager of the Inwood Library. A couple of years ago, the library participated in the annual city-wide Latin American Cultural Week festival and held an evening of Venezuelan jazz. The next day, I was helping a man at the information desk when he starting looking a little embarrassed, breaking eye contact and stammering, and said in beginning English "I am from Venezuela. I was sad yesterday, then I heard music from my country and met people from my country and I am happier. Thank you." It is moments like these that make me proud to have worked as a public librarian for 30 years.

My team does amazing work every day--for homesick immigrants, overwhelmed parents of young children, seniors needing a friendly face. We do this despite the aging, often uncomfortable, inefficient building. It isn't just about a leaky roof--it is about the need for an inspirational teen space, for sight lines to allow us to keep quiet areas quiet, for comfortable attractive community and programming rooms that are easily monitored by staff.

Today, at the Inwood library, third grader Camila will attend tutoring to help her with reading difficulties in our basement community room as she does several times a week. The basement rooms are large but hot in winter and cold in summer, difficult to monitor (the entrance is outside of staff view) and just plain ugly. Camila deserves a beautiful and comfortable space to improve

her skills. Andi 13, will come in. Obsessed with computer games, hanging with friends, sometimes using less than appropriate language: typical middle schooler. Uncomfortable in the adult floor while those on the children's floor aren't always comfortable with him! He needs a space where he fits, that will inspire him to develop skills for the future. Please give Camila and Andi that space. A brand new, larger Inwood library like the one being planned will allow it to happen.

Thank you.



New York
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NEW YORK CITY COUNCIL

THE SUBCOMMITTEE ON ZONING AND FRANCHISES IRIS WEINSHALL CITY COUNCIL REZONING HEARING TESTIMONY

July 10, 2018

Good afternoon, Chair Salamanca, Subcommittee Chair Moya, and members of the committee. My name is Iris Weinshall and I am the Chief Operating Officer of the New York Public Library (NYPL).

I am very pleased to testify in support of this ULURP application for the proposed development known as the Eliza, a mixed use building with approximately 175 units of affordable housing. This project will include a new state-of-the-art library which will be owned and operated by The New York Public Library. In addition to the library, the building will house a universal Pre-K center and a community center known as ACTS: the Activities, Culture, and Training Center.

The NYPL is the nation's largest public library system, including 88 neighborhood branches across The Bronx, Manhattan, and Staten Island and four world-renowned research facilities. Our collections hold approximately 45.2 million research items and just over 23.8 million circulating materials. In Fiscal Year 2017, NYPL hosted over 17 million visits and offered over 93,000 programs to nearly 2 million attendees. We currently have more libraries and more public library square footage than at any time in our history.

Our public libraries have been an essential presence in every neighborhood across the city for more than a century, providing a safe and reliable space for all New Yorkers regardless of age, background, or economic means. The NYPL has been providing library service to the Inwood community since 1902. We moved to the current location in 1952. In Fiscal Year 2017, the Inwood library had nearly 160,000 visits and circulated over 250,000 materials. While the Inwood library team continues to provide exceptional service, the aging building is outdated and in need of repairs. This project provides a unique opportunity to rebuild the library at the existing location and give the Inwood community the programs and services it deserves now and well into the future. An opportunity like this doesn't come very often. This is especially important for a library such as Inwood with significant physical needs.

The current issues at our Inwood library branch, include:

- Leaky roof
- Old and inefficient HVAC system
- No dedicated teen room (currently a section of the adult reading room)
- Columns and elevator in the middle of the building

- Lack of visibility for safety and monitoring spaces
- Lack of sufficient outlets and wiring
- Insufficient community space in the basement

In addition to replacing an aging building, we believe this project will provide significant opportunities to help expand programming in Inwood and be a more welcoming and inspiring space for children and families for years to come. We know from experience that new, fully renovated, state-of-the-art libraries mean increased visits, circulation, program attendance and a better library experience.

Our current program offerings at Inwood, include:

- Early Childhood
- Bilingual Literacy for School Aged Children
- STEAM Activities for School Aged Children, including teen tech and a tech club for teens and tweens.
- Book Discussions - one at the library and one at YM&YWHA
- Citizenship Lawyer
- Financial Counseling
- Spanish Computer Classes
- Computer Lab
- ESOL
- OST
- Summer Reading

A new branch will allow us to:

- Expand current programs
- Create dedicated teen space and increase teen attendance and programming
- Provide additional and innovative tech classes and programming
- Provide college readiness programming
- Provide more reading and community spaces
- Provide additional ESOL classes

Libraries and its services continue to evolve; there is a growing need for comprehensive, community-based wrap-around services in addition to our core services. As stewards of this City, it is our responsibility to respond to the needs of our communities, and it is growing more difficult to respond to those needs in inadequate and aging buildings. That is why we support this proposed plan to create a new library for the Inwood community.

I remain available to answer your questions. Thank you.



**Community Board 12 - Manhattan
Washington Heights & Inwood**

530 West 166th St. Room 6-A, New York, NY 10032
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Website: www.nyc.gov/mcb12

Shahabuddeen A. Ally, Esq., Chairperson
Ebenezer Smith, District Manager

March 23, 2018

Hon. Marisa Lago, Chairperson
City Planning Commission
120 Broadway, 31st Floor
New York, NY 10271

RE: Inwood Rezoning, Uniform Land Use Review Procedure Application – Application No: 180073MMM, 18204ZMM, 180205 ZRM, 180206 PPM, 180207 PQM and 180208 HAM

Dear Chairperson Lago:

At the General Meeting of Community Board 12 Manhattan, held on Tuesday, March 20, 2018, the following resolutions passed with a vote of 37 in favor, 0 opposed, and 2 abstentions.

Whereas: The NYC Economic Development Corporation ("EDC") together with the Department of Housing Preservation and Development ("HPD"), the Department of Citywide Administrative Services ("DCAS"), the Department of Parks and Recreation ("NYC Parks"), and the Department of Small Business Services ("SBS") are proposing a series of land use actions to advance the Mayor's Housing New York: Five-Borough Ten-Year Plan and to implement the Inwood NYC Action Plan. The proposed land use actions (the "Proposed Actions") are outlined in Uniform Land Use Review Procedure ("ULURP") Application numbers 180073MMM, 18204ZMM, 180205 ZRM, 180206 PPM, 180207 PQM and 180208 HAM (the "ULURP Applications"). The Proposed Actions include:

1. Zoning Map Amendments to change all or portions of various existing zoning districts, change portions of existing zoning overlays, establish new zoning overlays, and map a Special Inwood District;
2. Zoning Text Amendments to establish a Special Inwood District, a Mandatory Inclusionary Housing (MIH) area, and a Waterfront Access Plan;
3. Site Disposition authority for certain city-owned lots to facilitate the development of future open space along the Harlem River waterfront (Block 2185, part of Lot 36), the creation of property with both street and waterfront frontage to allow for subsequent development (Block 2197 / Lot 75), and for the creation of affordable housing, a new public library, and Universal Pre-K classrooms (Block 2233 / Lot 13 and part of Lot 20);
4. Site Acquisition by the City of properties at Block 2197 / Lot 47 to facilitate the creation of property with both street and waterfront frontage, a condominium within a future development on Block 2233/ Lot 13 and part of Lot 20 for use as a library, and portions of Block 2183 and part of Block 2184 / Lot 1 to facilitate the creation of future open space along the waterfront between West 202nd Street and Academy Street.
5. Designation of city-owned Block 2233 / Lot 13 and part of Lot 20 as an Urban Development Action Area (UDAA) and Urban Development Action Area Project (UDAAP)

approval and disposition of these sites to facilitate the development of affordable housing, a new public library, and Universal Pre-K classrooms; and

Whereas: The Special Zoning District would modify the underlying zoning regulations, establish additional requirements, and allow for greater variety in the type and shape of development. More specifically, the Special Zoning District would:

- i) require a Special Permit for new hotels in zoning districts that permit hotels;
- ii) permit as-of-right additional community facility and commercial uses in manufacturing districts;
- iii) limit retail and heavy manufacturing uses to the ground floor;
- iv) permit commercial or utility parking as-of-right in C6-2 zoning districts; permit as-of-right commercial uses on the second floor in R7 and R8 zoning districts with a C2-4 commercial overlay;
- v) limit the FAR on waterfront sites in M-zones to 2 and allow for the transfer of development rights from waterfront blocks to upland blocks in M-zones;
- vi) require a five-foot street-wall set-back for new developments on West 218th Street in C6-2 districts;
- vii) require supplemental height and set-back requirements for lots along the shoreline or within 100 feet of the elevated rail line;
- viii) require a 15-foot set-back from the side lot property line for all new development that share a lot-line with buildings built prior to the 1961 zoning resolution and have legally-required side windows within 15-feet of the lot-line;
- ix) provide for supplemental ground floor regulations to the ground floor of residential buildings in certain zoning districts along major thoroughfares to include non-residential (i.e., commercial or community facility) uses;
- x) modify rear yard and rear yard equivalent requirements on certain M-zone sites in the Sherman Creek sub-district;
- xi) reduce off-street parking requirements for residential uses, allow for off-street accessory parking to be made available for public use, and permit as-of-right roof-top parking on M-zone sites in the Sherman Creek sub-area;
- xii) modify screening and enclosure requirements for commercial and manufacturing uses in the Sherman Creek sub-area while maintaining strict performance standards for developments next to residential uses; and

Whereas: The MIH area would establish the proposed C4-4D, C4-5D, C6-2, R7D, R8A, R8, R9A and a portion of the proposed R7A zoning districts as MIH areas that would require a percentage of new housing to be permanently affordable; and the Waterfront Access Plan would create a framework for the creation of new public waterfront open space along the Harlem River; and

Whereas: HPD is a co-applicant only for the UDAA and UDAAP. DCAS is a co-applicant only for the acquisition actions that are related to the HPD actions. NYC Parks is a co-applicant only for the acquisition actions related to future public open space along portions of the waterfront; and

Whereas: EDC advises that the Proposed Actions are part of a comprehensive neighborhood plan that will shape the future of Inwood for many years to come, that the City will make substantial investment in both capital projects and programmatic initiatives to implement the plan, and that Community Board 12, Manhattan ("CB12M") and the community have a special opportunity to guide these City investments; and

Whereas: It is CB2M's position that any comprehensive neighborhood planning, zoning and/or development initiative in Washington Heights and Inwood must protect existing neighborhood character; protect the existing stock of affordable housing (including a significant number of privately-owned, rent-stabilized buildings); create and support opportunities for the development of new affordable

housing; protect existing small businesses, support new economic and business development opportunities, preserve open spaces and landmarked views, and support increased demand on transit, education, recreation, and infrastructure; and

Whereas: CB12M understands that the Proposed Actions are for the most part not a development plan, that there is no guarantee that all or any of the projected development will occur, and that the development that may be realized will not occur at once but over a period of 15 years or more. However, since zoning sets the legal framework for what can be built and may be used to incentivize development, CB12M wishes to ensure that any rezoning is consistent with its vision for what constitutes positive neighborhood change; and

Whereas: Although the Proposed Actions are for the most part not a development plan, two of the Proposed Actions would facilitate a development project, i.e., redevelopment of the Inwood Public Library (the "Inwood Library Project") as a mixed-use building that includes affordable housing, a new public library, and Universal Pre-K classrooms. Community residents have expressed significant concern and intense opposition to the Inwood Library Project. The Inwood Public Library Project raises several important questions pertaining to library services during the construction period such as where the temporary library will be located, how large it will be and which programs and services currently provided at the Inwood Library will be provided at the temporary library, and additional questions pertaining to the services and availability of and physical access to books, periodicals, and reference materials and journals in the permanent library. These and other questions and considerations must be thoroughly reviewed independent of the Proposed Actions and in conjunction with the review and approval of the developer designated by HPD and its development proposal for the Inwood Library Project; and

Whereas: Although CB12M has advocated for both contextual rezoning and a comprehensive updating of the zoning in Washington Heights and Inwood, the Proposed Actions are not a result of any CB12M action or request. The Proposed Actions initially concentrated on the geographic area (the "Rezoning Area") generally from 10th Avenue to the Harlem River and included a strong economic development focus. The Rezoning Area expanded to include areas west of 10th Avenue as a result of range of comments from community residents and local elected officials; and

Whereas: The Broadway corridor south of Dyckman Street to Nagle/Hillside/Bennett Avenues historically has been considered part of Inwood but is excluded from the study area, despite repeated requests by CB12M to include that corridor in an analysis for contextual zoning, including in resolutions dated October 2012 and July 2016; and

Whereas: The Proposed Actions generally divide the Rezoning Area in two – east and west of 10th Avenue, and then into five sub-areas – the Upland Core, the Commercial U, Sherman Creek, the Upland Wedge, and the Tip of Manhattan. The focus in the Upland Core, except for the blocks referred to as the "Upland Wedge," is on contextual zoning to respect and preserve the existing built fabric. The focus for the Upland Wedge and the area east of 10th Avenue is encouraging commercial, residential and community facility development. Within the area west of 10th Avenue, the "Commercial U" i.e., Dyckman Street, Broadway, and West 207th Street, the emphasis is on greater commercial density, including permitting 2nd floor commercial activity, not just on the street level. MIH is proposed in areas east and west of 10th Avenue; and

Whereas: Respecting and preserving neighborhood character involves more than contextual zoning considerations; it also includes historic preservation. The Landmarks Preservation Commission is not among the city agencies involved in the Inwood NYC Action Plan nor is any consideration given to the historic designation of individual buildings or historic districts, despite persistent advocacy on the part of CB12M and local residents; and

~~Whereas: There are several sites, areas, and structures within CD12 which are worthy of preservation and which, without attention, will become endangered due to neglect and disrepair; and~~

Whereas: There are a variety of ecologically sensitive areas at the shoreline along the eastern edge and the Tip of Manhattan including not only Sherman Creek but also the North Cove (above 207th Street), itself a reclaimed dump that is now a fragile natural bird habitat and wildlife sanctuary. Also, the eastern area of Inwood is within a flood zone identified by the New York City Panel on Climate Change; and

Whereas: The existing residential zoning in the Upland Core is R7-2, a medium density zoning district with an allowable FAR of 3.44 to a maximum of 4 under Quality Housing. Unless Quality Housing is used, R7-2 has no maximum building height limits. Apart from the Dyckman Houses, the building type envisioned by R7-2 zoning is dissimilar to the built fabric of the Upland Core. Indeed, the existing built environment pre-dates the current 1961 zoning. EDC proposes to rezone this area to predominantly R7A, as requested by many community residents. R7A allows building height and density similar to the existing housing stock. In general, R7A is an appropriate contextual zoning district for the Upland Core, but further review and dialogue is required to ensure that rezoning in the Upland Core is carefully tailored and not a blanket application. For example, R7A would dramatically reduce the ability of Holy Trinity Church inwood to propose for review and consideration by CB12M and other stakeholders a mixed-use development of residential and community facility uses at the density currently permitted by the R7-2 zoning. Also, there are houses on Payson and Seaman Avenues and on 217th and 218th Streets for which R7A is in fact not contextual and might be treated differently; and

Whereas: Rezoning to allow for adaptive reuse of the existing buildings on Dyckman Street west of Broadway for a mix of commercial and community facility uses in addition to new residential development should be considered as it may be a better option than the proposed R7A zoning with MIH. This area is currently zoned C8-3, which is generally for automotive and heavy commercial uses; housing is not permitted. CB12M passed a resolution asking for C8-3 districts within Washington Heights and Inwood to be rezoned. While the Proposed Actions do that, the proposal is for R7A with MIH to encourage new development. However, this area is a sensitive location given its proximity to major landmarks, Fort Tryon Park and the Cloisters, and the importance of maintaining scenic view corridors both of and from the Park. Rezoning to encourage adaptive reuse mitigates against the potential for blocking views. Any rezoning that encourages new development must be carefully considered to ensure that new buildings permitted as-of-right will not obstruct views of the Cloisters or intrude on views from the Park; and

Whereas: The "Commercial-U" currently has C4-4 zoning and R7-2 zoning with commercial overlays. Under the Proposed Actions the existing zoning is replaced with R7D zoning with MIH, R8A zoning with MIH, C4-4D and C4-5 D zoning. While the zoning districts proposed are contextual zoning and impose height limits, further study is needed with respect to appropriateness of the contextual zoning districts selected and the height limits associated therewith. The 11-story maximum building height allowed under R7D with MIH might compromise views of the Cloisters. The 14-story maximum building height allowed under R8A zoning with MIH proposed for the corner of Broadway and 207th Street and the C4-4D zoning with MIH proposed for the corner of Broadway and Dyckman Street might compromise or compete with views of the Cloisters. In contrast, any potential new construction near the Dyckman Houses or 207th Street and 10th Avenue would need to respond to physical conditions and contextual concerns that are not focused on view corridors but rather the elevated train which creates a condition where it makes sense to set buildings back, have non-residential uses on the first two floors and allow the residential units to rise above the level of the elevated tracks; and

- Whereas: EDC should explore if rezoning is the most effective way to spur and support business activity within the Commercial U or if targeted deployment of SBS programs and incentives might be more appropriate and effective for the immediate and near-term needs of small businesses; and
- Whereas: Excessively tall buildings on Broadway within the "Commercial U" would provide a precedent for buildings on Broadway south of Dyckman Street dramatically to exceed the current contextual heights, threatening the scenic landmarked views of and from Fort Tryon Park, which development is directly contrary to prior resolutions of CB12M; and
- Whereas: The "Tip of Manhattan" area east of Broadway presents an exciting opportunity for planned mixed-use development. The proposed commercial, residential and community facility uses and transforming the area into a place to live, work and visit should be encouraged. However, more of the waterfront should be dedicated to residential uses instead of M1-4, residential buildings should not be dominated by commercial or institutional buildings, and the height of residential buildings, currently proposed at up to 29 stories, should approximate the height of the Dyckman Houses; and
- Whereas: The Proposed Actions seek to encourage a more diverse mix of uses in the "Upland Wedge" and to make 10th Avenue more pedestrian friendly. While these are reasonable planning objectives, uniformly allowing a building height of up to 16 stories is excessive; the maximum building height should be reduced to approximately 10 to 12 stories. Also, the R7D with MIH proposed for the west side of Broadway between 215th and 218th Streets which allows 11 stories is problematic as it allows new buildings on Broadway that rival of the height of nearby buildings on Park Terrace East, masking the legibility of the urban fabric that results from development on the area's hilly topography and blocking views. The maximum building height along this section of Broadway should be limited to approximately eight stories. Also, further study is required to determine rezoning options that will not reduce the ability of 5030 Broadway, which has become a center for small businesses and non-profits that serve the community, to be used for commercial or self-storage purposes. The Proposed Actions would reduce the allowable FAR in this existing building and would make self-storage, an existing business operation, non-conforming; and
- Whereas: The "Sherman Creek" section of the area east of 10th Avenue has the greatest potential for new development if an agreement can be reached with Con Edison, the owner of the largest privately-owned sites with development potential in addition to those owned by the City of New York. While there is an existing residential section in Sherman Creek, housing is not permitted as of right under the current zoning. There is limited public access to the waterfront. The R7A zoning (eight stories) and R7A zoning with MIH (nine stories) proposed for Sherman Creek is reasonable, but the proposed R8A zoning with MIH (24 stories), and R9A zoning with MIH (estimated at up to 29 stories) is excessive. New development in the Sherman Creek area should create a streetscape that respects Inwood's mid-rise scale and limit the maximum height of taller buildings or sections of buildings so that they are similar in height to the Dyckman Houses, not towering over them; and
- Whereas: Any development that may occur in the Sherman Creek and the Tip of Manhattan areas will be new development in the 21st century, not mid-20th century development, on sites that are being re-envisioned for new uses. A new urban environment will be created. The planning, design and development of that new environment must respond to a broader neighborhood context, but must also explore and conform to what is required of good urban form in the 21st century; and
- Whereas: CB12M has for two decades requested that the City invest in a state-of-the-art Technology Hub focused on economic development and education, with job training, job search, resources for entrepreneurs and start-ups, workspace with flexible leasing, classroom and event/breakout space, and a modern cultural center to support artists and arts organizations in Northern Manhattan as

well as promoting the community's culturally rich history. Manhattan's only full-service jobs technology center is near Times Square, far away from and unused by the uptown community that needs it most. There is no cultural center in Inwood, and a dearth of such resources disparately located within CD12 despite a large and vibrant arts community; and

Whereas: Slave, African-American, and Native American burial grounds lie beneath the land currently occupied by the MTA rail yards as well as other developed sites within the "Tip of Manhattan" and "Upland Wedge" areas, and care must be exercised not only in terms of not disturbing remains but also preserving and memorializing the cultural heritage and historical significance of these sites; and

Whereas: Developing new affordable housing is a priority for Washington Heights and Inwood, but affordability must be defined by what is affordable to local residents, not by the area median income ("AMI") for the New York City or the New York City metropolitan region. The median income for households in Washington Heights and Inwood, based on the Inwood NYC Action Plan, is \$41,687, compared to \$72,871 for all of Manhattan and \$53,373 for all of New York City. The income for 28% of local households is less than \$24,500 (less than 30% AMI), the income for 18% of local households is between \$24,501 and \$40,800 (31%-50% AMI), the income for 18% of local households is between \$40,801 and \$62,250 (51% - 80% AMI), the income for 9% of local households is between \$62,251 and \$81,600 (51%-100% AMI), and the income for 27% of local households is \$81,601 or more (over 100% AMI). These income ranges and associated percentages define affordability for Washington Heights and Inwood ("Local Affordability"). The distribution of local household income evidences that Washington Heights and Inwood is home to households of diverse income ranges, affordable housing must address tiers of affordability, and that there is a significant need for affordable housing for households in the lower income brackets; and

Whereas: Although MIH generally requires only 25-30% of units developed to be permanently affordable, when HPD updated its term sheets in 2017, it included a requirement that if a project is built to include MIH, either by virtue of being in a neighborhood rezoning area or it is a singular site that is being rezoned, and uses HPD subsidies, then the project must provide an additional 15% of units as permanently affordable; and

Whereas: Implementation of the Proposed Actions and the Inwood NYC Action Plan will have significant impacts on local transportation and utility infrastructure, but it is unclear in particular if the Metropolitan Transportation Authority ("MTA") is actively engaged with EDC and the Mayor's Office in the planning and implementation of improvements to its system, and

Whereas: Implementation of the Proposed Actions and the Inwood NYC Action Plan will have significant impacts on current conditions of traffic congestion and deficient parking capacity, but it is unclear what provisions have or will be considered to mitigate these adverse impacts; and

Whereas: Implementation of the Proposed Actions and the Inwood NYC Action Plan will have as yet unknown near- and long-term impacts on local small businesses and therefore must include protections for existing small businesses, promote job development, strengthen business development activities, and diversify the local economic base to address retail shrinkage; and

Whereas: Implementation of the Proposed Actions and the Inwood NYC Action Plan will generate additional use of and demand for programs and services in local parks, schools, community facilities, uniformed services, sanitation, and other municipal services. Funding must be provided to support existing facilities, program and services, expand services, and build additional facilities; and

Whereas: Implementation of the Proposed Actions and the Inwood NYC Action Plan will increase the population served by existing uniformed services. Funding must be allocated to ensure that these services, the facilities from which these services are provided, and the staff providing them can keep up with increased demand without any decrease in the level of service; and

Whereas: The Proposed Actions were presented to committees of CB12M on various occasions throughout 2017 as well as in January, February, and March 2018. CB12M commented on the Draft Scope of

Work for the Draft Environmental Impact Statement ("DEIS") for the Proposed Actions in October 2017, and will comment in a separate resolution on the DEIS released for review and comment in January 2018. CB12M held a public hearing attended by approximately 500 people on February 22, 2018 to obtain community input on the ULURP Applications. Throughout the course of discussions of the Proposed Actions, CB12M and community residents have expressed deep concern with aspects of the scale of new development permitted under the proposed rezoning; the potential for displacement of low-income residents, rent-regulated tenants, and small businesses; the affordability levels proposed for affordable housing; the adequacy of utility infrastructure to accommodate new development, and the accuracy and adequacy of the DEIS; and

Whereas: The stated goals and objectives of the Inwood Action Plan are to Support Affordable Housing, Create a comprehensive zoning framework, Improve Neighborhood Infrastructure, and Invest in people. These are worthwhile goals and objectives, but CB12M questions how well the Proposed Actions will realize them, and believes that the Proposed Actions should be modified to advance these goals in a way that is more appropriate for Inwood; and

Whereas: CB12M is not opposed to rezoning, having passed various resolutions supporting contextual rezoning and rezoning C8-3 zoning districts, or to new development, but requires any rezoning or new development to respect the urban fabric of Washington Heights and Inwood, thoughtfully consider how new urban interventions impact the existing built environment, and carefully balance new development with the preservation of neighborhood character; now, therefore, be it

Resolved: CB12M does not support the Zoning Map Amendments as proposed and recommends that the City Planning Commission and the City Council modify the Zoning Map Amendments as follows:

1. Modify, as needed, the R7A zoning proposed for the Upland Core to address Holy Trinity Church Inwood's development plans.
2. Revise the zoning proposed for the C8-3 area west of Broadway to ensure that maximum building heights do not compete with view corridors to and from the Cloisters and Fort Tryon and Inwood Hill Parks and to allow for adaptive reuse of the existing buildings for a mix of commercial, retail and community facility uses in addition to new residential development.
3. Reduce the maximum building height allowed for new construction in the Commercial U to avoid competing with view corridors of the Cloisters and from Fort Tryon Park, and to relate more sympathetically to existing buildings.
4. Reduce the height of buildings in the Upland Wedge to 10-12 stories except for buildings along Broadway between 215th and 218th Streets, where the maximum height should be limited to eight stories.
5. Revise the zoning proposed for the Upland Wedge to avoid reducing the allowable commercial FAR at 5030 Broadway and making self-storage business operations non-conforming.
6. Reduce the maximum height of new construction in the Tip of Manhattan and Sherman Creek sections of the Rezoning Area to relate to the scale of the Dyckman Houses.
7. Reduce the maximum of height allowed for new construction in the Upland Wedge, Upland Core, and Tip of Manhattan to ensure that there is no visual encroachment to or from, or shadowing of, Inwood Hill or Isham Parks; and be it further

Resolved: In addition to these modifications to the Zoning Map Amendments, CB12M recommends that the City modify zoning or enact legislation, as appropriate, to limit within the rezoning area the size of new retail establishments, except for supermarkets, to approximately 3,000 square feet; and be it further

Resolved: CB12M supports the Zoning Text Amendment to establish a Waterfront Access Plan; and be it further

- Resolved: CB12M supports the Zoning Text Amendment to establish a Special Inwood District on the condition that any reduction to off-street parking requirements for residential uses is subject to a mandatory, project-specific parking study to assess the impact of any reduction and identify actions to mitigate adverse impacts; and be it further
- Resolved: CB12M supports the Zoning Text Amendments to establish a Mandatory Inclusionary Housing area on the condition that any affordable housing developed is required to use the deep affordability MIH option to ensure Local Affordability, and on the condition that EDC, HPD and the Mayor's Office facilitate the allocation of HPD subsidies to any project developed under MIH to ensure that a higher percentage of units, i.e., an additional 15%, must remain permanently affordable; and be it further
- Resolved: CB12M calls upon EDC, HPD and the Mayor's Office to require any residential development on city-owned property to be 100% affordable at the income range of Inwood residents; and be it further
- Resolved: CB12M calls upon EDC, HPD and the Mayor's Office to require any residential development built under MIH to use the affordability option that requires deep affordability, and be it further
- Resolved: CB12M supports the Site Disposition and Site Acquisition actions required to facilitate the development of future open space along the Harlem River waterfront, to create property with both street and waterfront frontage to allow for subsequent development and to create future open space along the waterfront between West 202nd and Academy Streets; and be it further
- Resolved: CB12M does not support the Site Disposition, Site Acquisition, UDAA or UDAAP actions required to facilitate the creation of affordable housing, a new public library, and Universal Pre-K classrooms as they should be addressed independently from the Proposed Actions and in the context of review and approval of the developer designated by HPD and its development proposal for the Inwood Library Project; and be it further
- Resolved: CB12M calls upon EDC and the Mayor's Office to engage the Landmarks Preservation Commission to give priority attention to the designation of properties in Washington Heights and Inwood consistent with various resolutions passed by CB12M, paying particular attention to the effects of development on CB12M's parks and their perimeters; and be it further
- Resolved: CB12M calls upon EDC and the Mayor's Office to engage the Landmarks Preservation Commission to give priority attention to designation of areas of importance and significance related to African and to Native American heritage, and to also engage with the Department of Transportation and other City and State agencies as necessary to provide informational and way-finding signage to areas designated related to African and Native American heritage, memorialize these sites, where practical restore these sacred sites, and provide public access to these sites; and be it further
- Resolved: CB12M calls upon EDC and the Mayor's Office to actively engage the MTA and continue to engage the Department of Environmental Protection, Con Ed and telecommunications providers to make significant investments in and modernization of Washington Heights and Inwood's transportation and utility infrastructure including electrical, gas, water and sewer drainage system infrastructure, and all traffic signal and alert systems where demand would exceed deliverable capacity; and be it further
- Resolved: CB12M calls upon EDC and the Mayor's Office to undertake a neighborhood-wide traffic and pedestrian safety study, with special attention given to pedestrian safety for senior citizens, and to identify and implement safety and streetscape improvements; and be it further
- Resolved: CB12M calls upon EDC and the Mayor's Office to undertake a neighborhood-wide public health and safety study to identify and implement operating and capital funding required to support the Proposed Actions as their implementation reaches critical threshold levels; and be it further
- Resolved: As previously requested by CB12M in resolution passed in October 2012 and July 2016, CB12M again calls upon the Department of City Planning to initiate, before year-end 2018, the process to develop a contextual zoning plan for Washington Heights and Inwood beginning with the area

generally bordered by West 180th Street on the south, the Henry Hudson Parkway on the west, Academy Street on the north, and the Harlem River Drive on the east (the "Target Area"), with the understanding that the plan would be extended to include the entire community district as soon as work in this area is completed; and be it further

Resolved: CB12M recommends that the Mayor's Office and the City agencies commit to and in fact undertake the following projects, programs and initiatives (the "Programs, Projects and Initiatives") as part of implementing the Inwood NYC Action Plan:

1. Strengthen administrative rules for tenant protections and consistently provide adequate funds to aggressively enforce housing laws, building codes, and anti-displacement initiatives;
2. Include the zip codes of all Washington Heights and Inwood in the Right to Counsel program prior to the implementation of any rezoning, seek legislation from the City Council to increase eligibility from 200% and under of the 2018 Federal Poverty Guidelines to a higher percentage that is more inclusive of low-income residents in Washington Heights and Inwood, and increase funding to legal services for rent regulated tenants who are not eligible for the Right to Counsel program;
3. Ensure permanent funding for the Certificate of No Harassment program and all other programs that protect residents against harassment and discrimination;
4. Continue funding and support for the Human Rights Administration's Anti-Harassment and Tenant protection programs;
5. Provide funding to the Dyckman Houses to address capital improvement and deferred maintenance needs;
6. Enact anti-harassment policies and penalties to protect small business owners;
7. Enact legislation, such as the Small Business Jobs Survival Act, to protect and strengthen the negotiating position of small businesses;
8. Create incentives to encourage landlords to offer affordable lease renewals to small businesses;
9. Allocate a percentage of all new retail space in buildings developed on city-owned land or with city subsidies or other financing to current small business lease holders who are displaced due to landlords exercising demolition and new construction lease clauses;
10. Require a "Conditional Use Application" that requires a DCP public hearing for any chain store (formula retail use) that seeks to open in a rezoned area;
11. Construct or facilitate the construction of community facilities to accommodate a variety of users and uses including such as youth, fitness, senior citizens, day-care, and arts and culture inclusive of multimedia theatre, exhibition galleries, and multi-use rehearsal and workshop space;
12. Support the establishment and operation of incubator space for start-up businesses and work space for artists;
13. Reduce the poverty level among local residents, which currently stands at approximately 25%, through increased availability of and funding to vocational training, adult education, literacy, and other related programs;
14. Establish, monitor, and enforce aggressive MWBE participation goals for all new construction and renovation projects in the rezoned area, including professional service and construction contracts and with emphasis on creating opportunities for minority developers;

15. Study the apparent need for more space for the existing student population in the local public schools, determine the need for additional classroom, laboratory, auditorium, and gymnasium space required for the new residents in the rezoned area, identify sites in the rezoned area for any such additional schools, and provide the necessary capital and operating funding for these schools;
16. Invest in fiber-optic broadband, bio-technology and genomic research laboratories, health sciences and STEM education;
17. Structure transactions for the City- and/or Con Ed-owned sites in the Sherman Creek area to facilitate the development of residential or mixed-use developments that include 100% affordable housing consistent with prior representations, promises and/or agreements made to CB12M by Con Edison. Provide low-income tax credits, HPD subsidies, HDC financing and real estate tax abatements to these developments to ensure deeper affordability;
18. Complete and publish a survey of vacant city-owned land in Washington Heights and Inwood, identify sites suitable for residential or mixed-use development that includes 100% affordable housing, and facilitate the development of these sites through RFPs that allocate HPD subsidies to the development projects;
19. The City is encouraged to review the proposal set forth by Congressman Espaillat which envisions the development of 5,000 units of affordable housing, including 1,000 units dedicated to seniors, and work with the Congressman to refine the proposal into an action plan that can be implemented consistent with the neighborhood planning principles and concerns outlined in this document;
20. Include established community-based organizations as community sponsors in the development team for any project developed on city-owned land or that receives city-subsidies;
21. Engage the MTA to ensure that it undertakes projects to enhance ADA-compliance at subway stations on both the A, C and 1 lines in Manhattan Community District 12;
22. Increase funding to support and maintain local public parks, construct additional playground and other recreational space to serve the new residents, and encourage housing developers to provide recreational space for their residents;
23. Monitor the delivery of public safety and emergency response and preparedness services over the course of implementing the Proposed Actions and the Inwood NYC Action Plan and provide additional capital and operating funds as required to maintain at current or enhanced levels these services, the facilities from which they are provided, and the staff dedicated to providing them;
24. Complete the Harlem River waterfront greenway to provide enhanced public access to the waterfront, with attention to pursuing environmentally sensitive design approaches to preserve and protect the ecological integrity of the waterfront and to provide comprehensive flood mitigation and buffer measures incorporating natural methods such as marsh, grassland development, parkland, and oyster beds;
25. Require all new construction to include sustainable and universal design features and pursue sustainable and universal design retrofits for existing buildings;
26. Aggressively deploy the Participation Loan Program ("PLP"), 8A loan program and other HPD capital funding programs to finance required capital improvements in existing rent-

stabilized housing stock and, through the execution of new regulatory agreements associated with this financing, further protect the long-term affordability of existing rent-stabilized housing;

27. Aggressively deploy SBS programs and services to local small business owners to make them aware of available programs and services and to facilitate businesses accessing these programs and services;
28. Develop an economic development strategy to attract new businesses and employers to Washington Heights and Inwood and to assist local residents to secure jobs with these new businesses/employers;
29. Create incentives for employers in diverse fields citywide, including City government, to provide skills enhancement and training to entry-level employees;
30. Hold real estate taxes for properties within the rezoning area at current levels for three to five years after enacting the Proposed Actions to allow commercial landlords and tenants time to assess the impacts of the rezoning;
31. Maintain and increase affordable off-street parking capacity;
32. Study and pursue options for implementing resident-only parking during certain hours in residentially zoned districts within the rezoning area that do not have commercial overlays;
33. Offer tax incentives for landlords to renew affordable leases to existing parking garages and to those who want to expand parking capacities;
34. Give priority to small business enterprises for new ground-floor retail space created in new residential and commercial developments;
35. Preserve ecologically sensitive areas including the North Cove (above 207th St.), bird habitats and migratory paths;
36. Improve Monsignor Kett Playground at Tenth Avenue and 204th Street;
37. Add areas for public barbecuing and community gardening;
38. Engage private property owners to facilitate restoration and preservation of the Seaman-Drake Arch, William A. Hurst House, and other sites of historic significance;
39. A state-of-the-art Technology Hub focused on economic development and education with job training, job search, resources for entrepreneurs and start-ups, workspace with flexible leasing, classroom, and event/breakout space, etc. and be it further

Resolved: CB12M calls upon City Council Member Ydanis Rodriguez, Manhattan Borough President Gale Brewer and their successors to work closely and diligently with CB12M and the local community to ensure that CB12M's recommended zoning modifications and all the other above resolutions and recommendations are implemented, and that the Mayor's Office and City agencies follow through on the implementation of the Programs, Projects and Initiatives; and be it further

Resolved: CB12M calls upon the New York State Legislature to strengthen existing rent regulations to stem the loss of rent-regulated units and protect the availability of currently affordable units in existing buildings; and be it further

Resolved: CB12M calls upon the Mayor's office and indeed all city elected officials to continue to work with members of New York City's congressional representatives to aggressively oppose federal cuts to programs for affordable housing, public housing, education, healthcare, community services, mass transportation, environmental preservation, and community development, all of which are critical to the well being of residents of Washington Heights and Inwood, and without which the Proposed Actions and the Inwood NYC Action Plan cannot be realized in a manner beneficial to local residents.

Sincerely,



Shahaddeen A. Ally, Esq.
Chairperson

cc: Hon. Andrew Cuomo, Governor
Hon. Bill de Blasio, Mayor
Hon. Gale Brewer, Manhattan Borough President
Hon. Scott M. Stringer, Comptroller
Hon. Letitia James, Public Advocate
Hon. Charles E. Schumer, US Senator
Hon. Kirsten Gillibrand, US Senator
Hon. Adriano Espaillat, Congressman
Hon. Brian Benjamin, State Senator
Hon. Marisol Alcántara, State Senator
Hon. Alfred Taylor, Assembly Member
Hon. Carmen De La Rosa, Assembly Member
Hon. Ydanis Rodríguez, Council Member
Hon. Mark Levine, Council Member
Hon. Edith Hsueh, Director, DCP
Hon. James Patchet, President, NYC EDC
Charlie Samboy, NYC EDC

INWOOD NYC SNAPSHOT

La Ciudad está tomando acción para asegurar que Inwood continua siendo un barrio asequible y atractivo para familias trabajadoras.

INVERTIR EN LAS PERSONAS

Invertir en los residentes de Inwood, aumentando el acceso a la capacitación laboral, los programas para jóvenes y otros servicios, y apoyando a negocios locales



CUESTIONES CLAVES

Residentes de Inwood luchan con desafíos económicos, como el desempleo, salarios bajos, y necesitan acceso a oportunidades.

- » En el Centro Washington Heights Workforce1, la Ciudad ha conectado a personas que buscan empleo con más de **400** puestos de trabajo desde que fue inaugurado en septiembre 2016.
- » La Ciudad ha otorgado **\$1.1 millones** en subsidios para ayudar a que los negocios obtengan resultados satisfactorios y lanzando la campaña "Up in Inwood".
- » Desde julio 2016, el Washington Heights Business Solutions Center ha ofrecido más as de **50** cursos para propietarios de empresas pequeñas.

ACCIONES DE LA CIUDAD

ZONIFICACIÓN

Crear oportunidades para nuevas viviendas asequibles, recuperar la línea costera del río Harlem para el beneficio del público, y preservar el carácter del barrio



CUESTIONES CLAVES

El público está bloqueado para acceder a la línea costera del río Harlem.

La corriente zonificación prohíbe viviendas nuevas en partes de Inwood, y en otras áreas permite que propietarios construyan viviendas de tasa de mercado y sin ningún requisito de viviendas asequibles.

El carácter distinto – la arquitectura de los edificios – de Inwood no está protegido con la zonificación corriente.

- » Nuevas reglas de zonificación requieran que los nuevos desarrollos en la línea costera construyan y mantenga **espacios públicos abiertos**.
- » Al rezonificar **26** cuadras de terrenos subutilizados al este y a lo largo de la Décima Avenida, la Ciudad permitirá nuevas viviendas, instalaciones comunitarias, tiendas y oficinas, y un mejor entorno peatonal y acceso público a la línea costera.
- » La rezonificación creara la posibilidad de más de **1,300** nuevos apartamentos asequibles.
- » La Ciudad ha expandido la área de rezonificación en respuesta a los intereses de la comunidad. La rezonificación limitara la altura de nuevos edificios y tienen guías específicas para dar forma a los desarrollos.

ACCIONES DE LA CIUDAD

Más de **2.500** miembros comunitarios han participado en el plan comprensivo para el futuro de Inwood.

Para más información, por favor contacte al equipo Inwood NYC por correo electrónico Inwood@edc.nyc o visite www.edc.nyc/inwoodnyc.



INWOOD NYC SNAPSHOT

La Ciudad está tomando acción para asegurar que Inwood continúe siendo un barrio asequible y atractivo para familias trabajadoras.

VIVIENDAS

Proteger inquilinos, preservar viviendas asequibles, y producir nuevas viviendas asequibles



CUESTIONES CLAVES

Inquilinos de Inwood reportan una proporción alta de acoso de su propietario.



La Ciudad está trabajando para proteger a inquilinos. Desde octubre del 2015, la Ciudad ha previsto **2,200** inquilinos en Inwood con asistencia legal gratis.

Visite las oficinas de Servicios Legales NYC- financiado por la Ciudad- 530 Broadway (esq. Calle 213) en Inwood, habitación 664.

Inwood tiene una de las más altas concentraciones de viviendas alquileres regulados en la Ciudad de Nueva York, pero se están perdiendo lentamente.



La Ciudad está **financiando la rehabilitación** de edificios con alquileres regulados para mantener alquileres asequibles.

Los alquileres en Inwood se están aumentando más rápido que en el resto de la ciudad.



La Ciudad está desarrollando viviendas **100%** asequibles, junto con una librería nueva y moderna en el lugar de la Biblioteca de Inwood.

En Inwood, no se ha construido un número significativo de nuevas viviendas asequibles en más de una década.



La Ciudad usará la zonificación para **exigir viviendas asequibles permanentes** en nuevos desarrollos.

ACCIONES DE LA CIUDAD

INFRAESTRUCTURA

Mejorar la infraestructura del barrio incluyendo calles, parques, drenaje, y espacios comunitarios



CUESTIONES CLAVES

No ha habido suficiente inversión pública en la infraestructura de Inwood en las últimas décadas.



La Ciudad está invirtiendo fuertemente en los parques magníficos de Inwood, incluyendo **\$30 millones** en mejoramientos de Highbridge Park.



La Ciudad está desarrollando el plan de drenaje para atender las necesidades de infraestructura de agua y alcantarillado.



La Ciudad está haciendo **calles seguras** para peatones y ciclistas. Recientemente mejoras incluyen el rediseño de la intersección de Broadway y Isham Street.

ACCIONES DE LA CIUDAD



INWOOD NYC SNAPSHOT

The City is taking action to ensure that Inwood continues to be an affordable, attractive neighborhood for working families.

PEOPLE

Invest in the people of Inwood by supporting local businesses and increasing access to workforce training, jobs, and youth programming



KEY ISSUES

Residents of Inwood struggle with economic challenges, such as unemployment and low wages, and need access to opportunity.

- >> **400** jobs connected with job seekers by the Washington Heights Workforce1 Career Center since opening in September 2016.
- >> **\$1.1** million in City grants to local organizations to help Inwood small businesses thrive, and "Up in Inwood" campaign launched.
- >> **50+** courses for small business owners at the Washington Heights Business Solutions Center since July 2016.

CITY ACTIONS

ZONING

Create opportunities for new affordable housing, reclaim the waterfront for the public, and preserve neighborhood character



KEY ISSUES

The public is blocked from accessing the Harlem River waterfront.

Current zoning prohibits new housing in parts of Inwood, and in other areas allows developers to build market-rate housing without including any affordable apartments.

Inwood's distinctive neighborhood character is not protected by current zoning.

- >> New zoning will require waterfront developments to build and maintain **attractive public open spaces.**
- >> **26** blocks of underutilized land east of and along 10th Avenue will be rezoned, enabling a revitalized waterfront with new housing, community facilities, shops, and offices.
- >> Rezoning will create the potential for over **1,300** new permanently affordable apartments.
- >> The City expanded the rezoning area in response to community concerns. The rezoning will limit the height of new buildings and have specific guidelines to shape developments.

CITY ACTIONS

2,500+ community members have participated in comprehensive planning for the future of Inwood.

For more information, please contact the Inwood NYC team at Inwood@edc.nyc or visit www.edc.nyc/inwoodnyc.



INWOOD NYC SNAPSHOT

The City is taking action to ensure that Inwood continues to be an affordable, attractive neighborhood for working families.

HOUSING

Protect tenants, preserve existing affordable housing, and produce new affordable housing

KEY ISSUES	<p>Inwood tenants report high rates of landlord harassment.</p>	»	<p>The City is working to protect tenants. Since October 2015, the City has provided 2,200 tenants in Inwood with free legal assistance.</p> <p><i>Visit the City-funded Legal Services NYC office at 5030 Broadway in Inwood.</i></p>	CITY ACTIONS
	<p>Inwood has one of the largest concentrations of rent-regulated housing in New York City, but they are slowly being lost.</p>	»	<p>The City is financing the rehabilitation of rent-stabilized buildings to keep rents affordable.</p>	
	<p>Rents are increasing faster in Inwood than in the rest of the City.</p>	»	<p>The City is developing 100% affordable housing along with a new, modern NYPL library branch on the Inwood Library site.</p>	
	<p>No significant new affordable housing has been built in Inwood in over a decade.</p>	»	<p>The City will use zoning to require permanently affordable housing in new developments.</p>	

INFRASTRUCTURE

Improve neighborhood infrastructure such as streets, parks, sewers, and community spaces

KEY ISSUES	<p>There has been insufficient public investment in Inwood's infrastructure over the last few decades.</p>	»	<p>The City is investing heavily in Inwood's magnificent parks, including \$30 million to improve Highbridge Park.</p>	CITY ACTIONS
		»	<p>The City is developing a drainage plan to address water and sewer infrastructure needs.</p>	
		»	<p>The City is making streets safer for pedestrians and cyclists. Recent improvements include redesigning the intersection of Broadway and Isham Street.</p>	



INWOOD NYC

**PLAN DE ACCIÓN PARA INWOOD NYC —
ACTUALIZACIÓN DEL INVIERNO 2018**

**INWOOD NYC ACTION PLAN —
WINTER 2018 UPDATE**

INWOOD NYC

ES UN PLAN INTEGRAL PARA INVERTIR EN EL FUTURO DE INWOOD

Desde la primavera de 2015, la Ciudad ha colaborado con más de 2.500 residentes, organizaciones comunitarias y otras partes interesadas en la planificación para asegurar que Inwood siga siendo un barrio asequible y atractivo para las familias de clase trabajadora y de inmigrantes. A partir de este diálogo surgió el Plan de Acción para Inwood NYC 2017, un conjunto de estrategias y acciones para seguir mejorando las numerosas fortalezas de Inwood y abordar sus crecientes desafíos.

Esta actualización del Plan de Acción presenta los avances logrados por la Ciudad y sus socios comunitarios en los últimos seis meses con respecto a las siguientes metas.

META

Apoyar las viviendas asequibles y de ingresos mixto



OBJETIVO

Preservar la asequibilidad de las viviendas que existen

Proyecto de preservación de 204th Street

La Ciudad está financiando la **rehabilitación de tres edificios de renta estabilizada** con 83 apartamentos, ubicados en 428-436 West 204th Street, lo que garantiza que las rentas se mantengan asequibles para las familias que viven allí.



Programa de cooperación para un barrio asequible

La Ciudad está financiando la **renovación de un edificio desocupado**, ubicado en 21 Arden Street. Los 15 apartamentos serán asequibles.

Programa pilares del barrio

Atreves de Nueva York, La Ciudad lanzara un fondo de \$275 millones para ayudar a organizaciones sin fines de lucro a **adquirir**

y **reacondicionar edificios de renta estabilizada para que sigan siendo asequibles.**

Programa de embajadores

Con el apoyo de la Ciudad, **Mutual Housing Association of New York (MHANY)**, por sus siglas en inglés fue elegido recientemente para ayudar a mejorar la salud física y financiera de edificios de apartamentos de Inwood. MHANY proveerán asistencia a propietarios para que preserven apartamentos asequibles con beneficios de crédito y fiscales.

OBJETIVO

Proteger a los inquilinos

Programa de Certificado Contra el Acoso

La Ciudad lanzara un programa en ciertos barrios, como Inwood y Washington Heights, **para proteger a los inquilinos del acoso.**

Si la Ciudad encuentra una historia de acoso a los inquilinos, a los propietarios no se le otorgará un permiso de trabajo.

Servicios legales gratuitos

Desde octubre de 2015, la Ciudad ha prestado asistencia legal gratuita a más de 2.200 inquilinos en Inwood. En noviembre 2016, la Ciudad también financió una nueva oficina de Legal Services NYC ubicada en 5030 Broadway, Inwood. La Unidad de Apoyo a Inquilinos [Tenant Support Unit] continúa visitando viviendas para informar a los inquilinos sobre sus derechos, documentar casos de acoso y amenazas de desplazamiento, y ponerlos en contacto con asistencia legales.

OBJETIVO

Crear nuevas viviendas con precios asequibles

Proyecto de biblioteca de Inwood

En agosto de 2017, la Ciudad publicó una Convocatoria a Propuestas para **crear una nueva biblioteca de última generación y más de 100 unidades de viviendas asequibles con espacio para Pre-K de Infancia Universal [Universal Pre-Kindergarten]**. Estas serán las primeras viviendas asequibles que se construyen en Inwood en más de una década, y gracias a nuevas políticas de la Ciudad, seguirán siendo asequibles al largo plazo. **Bajo corriente políticas, residentes de Inwood y Washington Heights tendrán preferencia para la mitad de los nuevos apartamentos.**

La nueva biblioteca, bajo la propiedad y gestión de la Biblioteca Pública de Nueva York, tendrá las mismas dimensiones que la sede actual y será en la misma locación, pero con **una mejor eficiente distribución, nuevos espacios educativos, programas comunitarios y tecnología más moderna.** Se abrirá una biblioteca temporal en Inwood durante la construcción.

Historia de éxito

El propietario de la vivienda donde reside Milady Pérez se negaba a hacer reparaciones esenciales en su apartamento de Inwood, como quitar la pintura con plomo que era peligrosa para su nieto pequeño. La Ciudad quitó la pintura y le brindó representación legal gratuita, que dio por resultado una reducción de la renta para la Sra. Pérez. Con la ayuda de la Ciudad, la Sra. Pérez y otros inquilinos presentaron una demanda que dio lugar a una orden judicial que obligaba al propietario a hacer reparaciones.



INWOOD NYC IS A COMPREHENSIVE PLAN FOR INVESTMENT IN INWOOD'S FUTURE

Since Spring 2015, the City has engaged over 2,500 residents, community-based organizations, and other stakeholders in planning to ensure that Inwood remains an affordable, attractive neighborhood for working and immigrant families. From this dialogue came the *Inwood NYC 2017 Action Plan*—a set of strategies and actions to build on Inwood's many strengths and address its rising challenges.

This Action Plan update outlines the progress the City and its community partners have made in the past six months toward the following goals.

GOAL Support Affordable and Mixed-Income Housing



OBJECTIVE Keeping Existing Housing Affordable

204th Street Preservation Project

The City is financing the **rehabilitation of three rent-stabilized buildings** with 83 apartments at 428–436 West 204th Street, ensuring that rents will stay affordable for families living there.



Affordable Neighborhood Co-op Program

The City is financing the **renovation of a vacant City-owned building** at 21 Arden Street. All 15 apartments will be affordable.

Neighborhood Pillars Program

The City is launching a \$275 million fund to help local nonprofit organizations **acquire and rehab rent-stabilized buildings to keep them affordable.**

Landlord Ambassadors Program

With City support, **Mutual Housing Association of New York (MHANY)** was recently selected to help improve the physical and financial health of apartment buildings in Inwood. MHANY will provide assistance to building owners who preserve affordability in exchange for City loans and tax benefits.

OBJECTIVE Protecting Tenants

Certification of No Harassment Program

The City is launching a pilot program in specific neighborhoods, including Inwood and Washington Heights, **to protect tenants**

from harassment. In certain targeted buildings, if a history of tenant harassment is found, owners will not be granted permits for building work without providing permanently affordable housing.

Free Legal Services

Since October 2015, **the City has provided over 2,200 tenants in Inwood with free legal assistance.** In November 2016, the City also funded a new Legal Services NYC office at 5030 Broadway in Inwood. And the Tenant Support Unit continues to go door-to-door informing tenants of their rights, documenting harassment and threats of displacement, and connecting them to legal assistance.

OBJECTIVE Creating New Affordable Housing

Inwood Library Project

In August 2017, the City released a Request for Proposals to **create a new, state-of-the-art library and over 100 units of affordable housing with space for Universal Pre-Kindergarten.** This will be the first affordable housing built in Inwood in over a decade, and through new City policy, this housing will remain affordable for the long term. **Under current marketing guidelines, residents of Community District 12 will receive preference for half of the new apartments.**

The new library, owned and operated by New York Public Library, will be the same size and at the same location as the current branch, but with a **more efficient layout, new educational spaces and community programs, and upgraded technology.** A temporary library space will be opened in Inwood during construction.

SUCCESS STORY

Milady Perez's landlord refused to make critical repairs to her Inwood apartment, such as removing lead paint that was hazardous to her young grandchild. The City removed the paint and provided free legal representation, which resulted in rent relief for Ms. Perez. With City support, Ms. Perez and other tenants filed a lawsuit that led to a court order requiring the landlord to make repairs.



META

Crear un marco de zonificación integral



OBJETIVO

Actualizar la zonificación para reflejar las necesidades y prioridades de la comunidad

Mejorar la Costa del Río Harlem

Mediante la rezonificación propuesta en la Ciudad, en las áreas al este de la avenida decima se proveerá acceso público a la costa y se permitirá la construcción de viviendas que tanto se necesitan,



incluyendo la posibilidad de más de 1.300 apartamentos asequibles en forma permanente. Residentes de Inwood y Washington Heights tendrán preferencia para la mitad de los nuevos apartamentos. La nueva zonificación exigirá que los desarrollos en la costanera construyan y mantengan espacios públicos abiertos atractivos y contribuyan a que las calles sean más atractivas para los peatones.

OBJETIVO

Respetar y fortalecer el carácter actual de Inwood

Preservar el carácter del barrio

En respuesta a los comentarios recibidos de la comunidad, **la Ciudad amplió la rezonificación para proteger el carácter actual de Inwood al oeste de la avenida decima**. Actualmente, la zonificación en estas áreas no tiene límites de altura ni requisitos de asequibilidad. El ochenta por ciento del área expandida se rezonificará para la preservación de distritos R7A, que limitan la altura de nuevos edificios. A lo largo de calles comerciales amplias con buena circulación, como Broadway y 207th Street, donde conforme a la zonificación actual podría construirse una gran cantidad de viviendas a los valores de mercado, todos los futuros desarrollos deberán incluir viviendas asequibles de

forma permanente (Ejemplo: \$1.100/ al mes para una familia de tres en un apartamento de dos habitaciones).



META

Mejorar la Infraestructura del vecindario



OBJETIVO

Mejorar los parques de Inwood



Highbridge Park

Mediante la iniciativa Anchor Parks, la Ciudad está invirtiendo \$30 millones para transformar Highbridge Park, con mejoras en la iluminación, el pavimento y la accesibilidad, y la restauración de la Gran Escalinata en Laurel Hill Terrace. El inicio de la construcción se encuentra programado para 2019.

Centro Natural de Inwood

Se ha completado el diseño para la rehabilitación, a un costo de \$1.9 millones, del Inwood Centro Natural de Inwood, con fecha de construcción prevista a empezar en 2018.

Subsidios para parques de Inwood

En colaboración con la Ciudad, Partnership for Parks ha asignado más de \$150.000 a 29 organizaciones comunitarias para la realización de mejoras y eventos en los parques Inwood Hill, Muscota Marsh e Isham.

OBJETIVO

Mejorar la seguridad de los peatones y las conexiones del barrio

Mejoras de calles

En respuesta a los pedidos de residentes locales y de la Junta Comunal 12, la Ciudad, a través del programa Visión Zero, está **mejorando la circulación del tránsito y haciendo que las calles de Inwood sean más seguras** para peatones y ciclistas. Las mejoras recientes incluyen:



- Carriles para bicicletas protegidos del estacionamiento, zonas de carga exclusivas para camiones y carriles de estacionamiento más anchos a lo largo de Dyckman Street
- Nuevos pasos de peatones en la intersección de 10th Ave y Dyckman Street
- Rediseño de la intersección de cinco calles en Broadway e Isham Street

OBJETIVO

Desarrollar la capacidad de la infraestructura del barrio

Actualizaciones Puente de la Avenida Broadway

A finales del 2018, **la Ciudad emprenderá la rehabilitación del Puente de Broadway** mediante el reemplazo/la reparación de elementos estructurales, la instalación de barreras y vallas de advertencia y facilitando el tránsito en bicicleta en el puente. ¡También se colocarán cajas nido para halcones peregrinos!

AYUDA RECIBIDA POR INQUILINOS EN INWOOD EN CIFRAS

 **Viviendas visitadas**
25,957

 **Llamadas de gestión de casos**
11,659

 **Casos abiertos**
903

 **Casos cerrados**
771

 **Inquilinos asistidos**
2,467

META

Invertir en las personas



OBJETIVO

Ayudar a que las pequeñas empresas prosperen y fortalecer los corredores comerciales

Centro de Soluciones Comerciales

El Washington Heights Business Solutions Center de la Ciudad, ubicado en 560 West 181st Street, está **ayudando a los propietarios de empresas a comenzar, operar y hacer crecer sus negocios**. Entre julio de 2016 y junio de 2017 el Business Solutions Center:

- Organizó más de 50 cursos
- Brindó asistencia a 27 empresas con sus arrendamientos
- Ayudó a 57 empresas a acceder a \$470.000 en capital
- Apoyó la apertura de 14 establecimientos de alimentos y minoristas, lo que generó 288 nuevos puestos de trabajo



Talleres de negocios



En respuesta a las necesidades expresadas por los propietarios de negocios de Inwood, **el Washington Heights Distrito de Mejora Para Empresas (BID) está trabajando en la planificación de más de una decena de talleres adicionales** con el Business Solutions Center para la primera mitad de 2018.

Fortalecimiento de los corredores comerciales

El programa Neighborhood 360° de la Ciudad ha otorgado \$1.1 millones en subsidios a Washington Heights BID y otras organizaciones locales para mejorar los corredores comerciales de Inwood y ayudar a que los negocios obtengan resultados satisfactorios. Los subsidios se han utilizado para lo siguiente:

- Lanzamiento del sitio web y campaña de marketing "Up in Inwood"
- Proporcionar 1.000 horas de recolección de basura y eliminación de grafiti a más de 300 empresas, y 50 nuevas latas de basura en partes comerciales
- Recoger más de 5.000 bolsas de basura y retirar 285 pegatinas y pósteres

“He aprendido mucho sobre mi negocio con el apoyo de nuestro instructor, oradores invitados y mis compañeros. Tengo previsto usar las herramientas adquiridas para seguir brindando lo mejor a mis pacientes y empleados.”

— *Dr. Jason Compton, Compton Eye Associates, Inwood*, sobre el programa "Pasos Estratégicos para el Crecimiento" [Strategic Steps for Growth] para proveedores independientes de atención de la salud

OBJETIVO

Conectar a los residentes de Inwood con empleos y trayectorias vocacionales

Nuevo Centro Workforce1

Desde que fue inaugurado en septiembre de 2016, el Centro Washington Heights Workforce1 de la Ciudad, localizado en 516 West 181st Street, **ha conectado a personas que buscan empleo con más de 400 puestos de trabajo**. Los servicios del centro fue creado por una asociación entre la Ciudad y la Fundación Robin Hood, y son específicos a las necesidades de Neoyorquinos nacidos en otro país. Los residentes del barrio han aprovechado los programas de capacitación dedicados a tecnología y atención de la salud, como los programas de Capacitación de Personal Auxiliar Médico Bilingüe y de Becas para Desarrollo Web de NYC.



OBJETIVO

Apoyar la comunidad artística y cultural de Inwood

Desarrollo de capacidades de la comunidad

El programa de la Ciudad sobre Desarrollo de Capacidades de la Comunidad ha proporcionado más \$160.000 en subsidios y organizado ocho sesiones de capacitación para apoyar el trabajo de las organizaciones culturales locales. A través de este programa, **en el otoño de 2016 se formó Northern Manhattan Arts and Culture, una coalición de organizaciones y personas vinculadas al mundo de la cultura**.



Desde entonces, el grupo ha lanzado www.nmac.nyc, una comunidad en línea con información sobre espacios, artistas y eventos, que también muestra el trabajo de artistas locales.

Historia de éxito

Rut Morillo tenía dificultades para encontrar trabajo y decidió empezar una carrera en atención de la salud. A través del Centro Workforce1, se inscribió en el Programa de Capacitación de Auxiliar Médico Bilingüe, donde recibió capacitación presencial, 100 horas de experiencia práctica como pasante en Urban Health Plan, y una certificación reconocida a nivel nacional. "Cuando hablo con auxiliares médicos que ya trabajan en el campo, se sorprenden de lo completo que es nuestro programa", dice Morillo. "Si bien no tenía experiencia previa, ya me siento segura en mi puesto de interno en la clínica".

GOAL
Create a Comprehensive Zoning Framework



OBJECTIVE
Updating Zoning to Reflect Community Needs and Priorities

Enhancing the Harlem River Waterfront

Through the City's proposed rezoning, areas east of 10th Avenue will gain access to the waterfront and



much-needed housing, including the potential for **over 1,300 permanently affordable apartments**, as well as commercial and community space. **New zoning will require waterfront developments to build and maintain attractive public open spaces** and help make streets more appealing for pedestrians.

OBJECTIVE
Respecting and Strengthening the Existing Character of Inwood

Preserving Neighborhood Character

In response to community input, **the City expanded the rezoning to protect the existing character of Inwood west of 10th Avenue**. Today, zoning in these areas has no height limits or affordability requirements. Eighty percent of the expanded area will be **rezoned for preservation with R7A districts**, which limit the height of new buildings. Along wide commercial streets with good transit—like 207th Street, where under existing zoning a large amount of market-rate housing could be built—all future developments will be required to include permanently



affordable housing at below-market rents (**Example: \$1,100 per month for a family of three in a two-bedroom apartment**).

GOAL
Improve Neighborhood Infrastructure



OBJECTIVE
Enhancing Inwood's Parks



Highbridge Park

Through the Anchor Parks initiative, the City is investing **\$30 million to transform Highbridge Park**—improving lighting, paving, and accessibility and restoring the Grand Staircase at Laurel Hill Terrace. Construction is scheduled to start in 2019.

Inwood Nature Center

The design phase of the \$1.9 million **rehabilitation of the Inwood Nature Center** in Inwood Hill Park is complete, and construction is expected to start in 2018.

Grants for Inwood Parks

Working with the City, Partnership for Parks has awarded over \$150,000 to 29 community organizations for **improvements and events in Inwood Hill Park, Muscota Marsh, and Isham Park**.

OBJECTIVE
Improving Pedestrian Safety and Neighborhood Connections

Street Improvements

In response to local residents and Community Board 12, the City, through Vision Zero, is **enhancing traffic flow and making Inwood streets safer** for pedestrians and cyclists. Recent improvements include:



- Parking-protected bike lanes, truck loading zones, and wider parking lanes along Dyckman Street
- New crosswalks at the intersection of 10th Avenue and Dyckman Street
- Redesign of the five-leg intersection at Broadway and Isham Street

OBJECTIVE
Building Capacity of Neighborhood Infrastructure

Broadway Bridge Rehabilitation

Beginning in late 2018, **the City will rehabilitate the Broadway Bridge** by replacing/repairing structural elements, installing new safety barriers and warning gates, and making the bridge more bike friendly. There will also be a nesting box for peregrine falcons!

TENANT SUPPORT IN INWOOD BY THE NUMBERS

- Doors Knocked 25,957**
- Calls Made 11,659**
- Cases Opened 903**
- Cases Closed 771**
- Tenants Assisted 2,467**

GOAL

Invest in People



OBJECTIVE

Helping Small Businesses Thrive and Strengthening Commercial Corridors

Business Solutions Center

The City's Washington Heights Business Solutions Center, located at 560 West 181st Street, is **helping business owners start, operate, and grow their businesses**. From July 2016 through June 2017, the Business Solutions Center:



- Held over 50 courses
- Assisted 27 businesses with their leases
- Helped 57 businesses access \$470,000 in capital
- Supported the opening of 14 food and retail businesses, generating 288 new jobs



Business Workshops

In response to needs expressed by Inwood business owners, **the Washington Heights Business Improvement District (BID) is planning over a dozen additional workshops** with the Business Solutions Center in the first half of 2018.

Strengthening Commercial Corridors

The City's Neighborhood 360° program has provided **\$1.1 million in grants** to the Washington Heights BID and other local organizations to **improve Inwood's commercial corridors and help businesses thrive**. The grants have led to:

- Launch of the "Up in Inwood" website and marketing campaign
- 1,000 hours of trash pickup and graffiti removal for over 300 businesses and 50 new on-street trash cans
- Over 5,000 bags of trash collected and 285 stickers and posters removed

OBJECTIVE

Connecting Inwood Residents to Jobs and Career Pathways

New Workforce1 Center

Since opening in September 2016, the City's Washington Heights Workforce1 Center at 516 West 181st Street has connected job seekers with over 400 jobs. The center's services, created through a partnership between the City and Robin Hood Foundation, are **tailored for the needs of foreign-born New Yorkers**. Neighborhood residents have taken advantage of technology- and health care-focused training programs such as the Bilingual Medical Assistant Training and NYC Web Development Fellowship.



OBJECTIVE

Supporting Inwood's Vibrant Arts and Culture Community

Building Community Capacity

The City's Building Community Capacity initiative has provided over \$160,000 in grants and held eight training sessions to support the work of local cultural organizations. Through this program



Northern Manhattan Arts and Culture, a diverse coalition of cultural organizations and individuals, formed in fall 2016.

The group has since launched www.nmac.nyc, an online community with information about spaces, artists, and events, while also showcasing the work of local artists.

SUCCESS STORY

Rut Morillo was unable to find work and decided to pursue a career in health care. Through the Workforce1 Center, she enrolled in the Bilingual Medical Assistant Training Program, where she gained classroom training, 100 hours of practical experience as an intern at Urban Health Plan, and a nationally-recognized certification. "When I talk to medical assistants already in the field, they are surprised at how comprehensive our program is," says Ms. Morillo. "Even though I had no background before, I already feel confident in my internship at the clinic."

“ I learned a lot about my business with the support of our instructor, invited speakers, and fellow participants. I plan on using the tools I learned to continue providing the best for my patients and employees. ”

— Dr. Jason Compton, Compton Eye Associates, Inwood, on "Strategic Steps for Growth" program for health care providers

PARTICIPE

Esta actualización del Plan de Acción es un diálogo continuo sobre el futuro de Inwood, ¡y queremos recibir sus comentarios! La Ciudad ha asumido el compromiso de seguir trabajando con la comunidad, e les pedimos a los residentes, trabajadores y a las empresas de Inwood que envíen sus comentarios.

Consulte el *Plan de Acción de Inwood NYC 2017* completo y las actualizaciones, y también los materiales sobre encuentros públicos y comentarios de la comunidad en inglés y español, a través de edc.nyc/InwoodNYC.

Para obtener más información o incorporarse a nuestra lista de correo y recibir actualizaciones periódicas sobre el plan, envíe un mensaje de correo electrónico a inwood@edc.nyc.

"Crear una sección completa del Marco de Zonificación": representaciones cortesía del Departamento de Planificación Urbana, Oficina de Diseño Urbano

"Mejorar la infraestructura del vecindario": Foto cortesía del Departamento de Transporte de la Ciudad de Nueva York

Enero 2018

STAY INVOLVED!

This Action Plan update is part of an ongoing conversation about the future of Inwood, and we want to hear from you! The City is committed to working with the community, and we urge Inwood residents, workers, and businesses to make your voices heard.

Explore the full *Inwood NYC 2017 Action Plan* and updates, as well as public meeting materials and community feedback in English and Spanish, at edc.nyc/InwoodNYC.

For more information or to join our mailing list and receive regular updates on the plan, contact us at inwood@edc.nyc.

"Create a Comprehensive Zoning Framework" section: Renderings courtesy of Department of City Planning, Urban Design Office.

"Improve Neighborhood Infrastructure" section: Photo courtesy of New York City Department of Transportation.

January 2018

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THE CITY OF NEW YORK
OFFICE OF THE COMPTROLLER
SCOTT M. STRINGER

**Scott M Stringer Testimony
Before the Subcommittee on Zoning and Franchises
Hearing on Inwood Rezoning**

July 10, 2018

Thank you Chair Moya and members of the Subcommittee on Zoning and Franchises for the opportunity to testify today on the proposed rezoning of Inwood.

I grew up in Washington Heights in the 1970s – the only decade in our City’s history where more people left than arrived. But there were some who stayed and took it upon themselves to rebuild their neighborhoods. They created the thriving communities that for-profit developers now covet.

Now, the very people that built their communities up are being priced out. Rents are rising twice as fast as wages, young people are struggling to stay in the places they have always called home, and our seniors – the anchors of our communities – are struggling to get by. More New Yorkers live in poverty than there are people in Philadelphia or Phoenix, and we are facing record levels of homelessness. We’re a city of immigrants—but people increasingly can’t afford to live here.

We cannot allow the entry ticket to New York to be a million dollar condo. Forget a tale of two cities. We are becoming a tale of two blocks, with a luxury condo on one block and public housing on the other. And with the current Inwood rezoning plan before this committee today, we can almost guarantee this tale of two blocks will continue and more Inwood residents will be pushed out.

The proposed rezoning of Inwood will fundamentally change the landscape of the neighborhood. It will add at least 5,000 new residential units, new community facilities, and additional commercial space. Any upzoning of this scale must be done with a delicate and deft hand to prevent unintended consequences.

Throughout the ULURP process, community residents have expressed concerns regarding the potential displacement of existing residents, the change in neighborhood character, and the need for deeper affordable housing. Absent a comprehensive plan to address these concerns, I must express my opposition to the proposed rezoning.

Neighborhood Character

The community has expressed a desire for lower building heights and densities to better match the neighborhood character. Given the community’s strong preference to preserve not reshape their community, the application should be modified to better fit in with the existing neighborhood.

In particular, recommendations by the community board and borough president should be implemented to protect the community and the view corridors from The Cloisters and Fort Tryon Park. By protecting the height and scale of the community, it will ensure new development blends seamlessly in with the urban landscape, rather than breaking from Inwood's traditional form. The Council should consider at minimum implementing the "low density" alternative outlined in the DEIS.

Residential Displacement

The proposed rezoning would add 5,195 new residential dwelling units – 4,397 more than are currently permitted as-of-right. These units would bring over 14,442 new residents into the neighborhood. The rezoning would provide as few as 1,376 new units of affordable housing from the Mandatory Inclusionary Housing program and the related redevelopment of City-owned sites.

This is concerning, as Inwood currently has more low, very low, and extremely low income individuals by percentage than both Manhattan and New York City as a whole, as well as more individuals living below the poverty line. The median income of the study area was \$42,500.

According to the DEIS, new units that enter the market will require an individual to earn over \$66,000 for a one bedroom and over \$83,000 for a two bedroom – far above the median income for the area. And a new building constructed in the area on Broadway and West 204th Street was priced so individuals would need to make \$86,000 for a one bedroom and nearly \$100,000 for a two bedroom.

Over the last two decades, Inwood has had only 200 new units of housing constructed. The City proposes adding over 3,000 new luxury units in the next 15 years. This will not alleviate demand, but create a new market that will incentive existing landlords to increase pressure on the existing housing stock.

The potential for long-term displacement due to existing pressures is real, however, this proposed rezoning would speed up those pressures in the near term, which will put the community at risk.

The study area has, according to the DEIS, experienced a slower increase in median income than Manhattan as a whole with a 1.2% growth, compared to 5.3% growth overall. While median rent has increased by 20% in the study area, it was slower than the 30% increase for Manhattan as a whole, and on-par with citywide growth levels.

Residents in the local community have expressed concerns about harassment and displacement. In Inwood, 82.6% of the residents live in rent regulated units, which mean harassment out of legal protections is the greatest risk for the neighborhood, not lack of density. Rather than focusing on a large redevelopment plan, the city should focus on a preservation plan for the area.

The City has already proposed a number of projects to preserve affordable housing in this area, including: instituting the certificate of no-harassment program to discourage landlords from harassing tenants, launching a new program to allow local nonprofits to acquire and rehabilitate rent stabilized buildings, providing assistance to existing building owners to preserve affordability in exchange for loans and tax benefits, and providing legal services.

These preservation programs should continue to mitigate the existing pressures and help preserve this neighborhood, but the total density of the rezoning must be reduced to prevent increasing the pressures on vulnerable tenants.

Further, the City should work to develop all City-owned sites in this area for 100% permanent affordable housing at income levels for this community. New models for ensuring permanent low-income housing, such as creating a new land bank modeled off of a land trust, should be considered.

Residential Infrastructure

Any significant increase in residential density puts strain on existing resources in a community. A basic principal of planning requires the City to balance out these infrastructure needs with the residential development.

The existing elementary schools in the district are already at 98.7% of capacity, with only 101 available seats. The proposed action will add an additional 528 elementary school students. The DEIS assumes that there will be no impact due to falling enrollment rates in the future, however, this reduction is not guaranteed. If the population remains steady, then the new students would increase utilization to 106% of capacity. The City must adequately plan for these new students or reduce the proposed density to mitigate the impact.

Further, the DEIS notes that there are anticipated unmitigated impacts on parks, mass transit, and traffic. If these issues are ignored, generations of New Yorkers will suffer from inadequate and crowded infrastructure.

Conclusion

Given the potential significant increase in density in this community, the City must work to fully mitigate potential negative impacts, reduce the density, and protect the character of the community. Absent significant change to align this plan with community priorities, I do not believe this rezoning will serve the best interest of the Inwood community or the City as a whole.

FOR THE RECORD

Manhattan
Legal
Services

Legal
Services NYC

July 9, 2018

Manhattan Legal Services is part of Legal Services NYC (LSNYC), the largest civil legal services provider in the country. LSNYC has a rich history of fighting poverty and seeking racial, social and economic justice for low-income New Yorkers. For over 50 years, we have challenged systemic injustice and helped clients meet basic needs for housing, access to high-quality education, health care, family stability, and income and economic security. Our neighborhood-based offices across the five boroughs service over 100,000 New Yorkers every year. My colleagues and I at the Inwood office of the Tenant Rights Coalition have had the privilege to work with many long-term residents and community leaders who will be affected by this proposed plan. In the last year and a half since we opened our Inwood office we have advocated for hundreds of tenants and litigated on behalf of dozens of buildings, and worked with community organizers to build tenant associations and support collective tenant actions. It is from that breadth of experience that we testify today.

Unfortunately, many Inwood residents were unable to have their voices heard today because of the time and location of this hearing, leaving the fate of hundreds of people in the hands of a few; the members of the community who were able to make this hearing, will, or already have, urged the City Council to vote NO on the current rezoning proposal. Such demands are based on a series of acute concerns shared by many in this community. These concerns have been echoed in the various hearings that have marked this process up until now. Gentrification, rising cost of housing, and the resulting displacement has been ailing

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Peggy Earisman, Director



the neighborhood of Inwood for years. As noted in the analysis provided in the recently published Policy Brief on this subject, written by the CUNY Dominican Studies Institute, “the price of all housing in Washington Heights/Inwood has appreciated six-fold between [the years] 2000 and 2015.”¹

Another version of this same trend is evinced in the real estate market of 2017-18. Today’s streeteasy.com listings show that in Inwood, a 2 Bedroom apartment that was rented for \$1875.00 in 2013, now goes for \$2,600.00.² Another listing shows that a 3 Bedroom apartment that was rented for \$1700.00 in 2014, now goes for \$2100.00; a standard price in some neighborhoods but a gross increase from the price it cost a family years ago.

In our work as a legal service provider we witness this gradual trend of unaffordability and displacement every day. Its causes are known to many of us: a vacancy increase that can raise rent by \$200 or more; a series of MCI increases that are lined up one after the other; exaggerated IAs -- all of these making apartments permanently unaffordable and assuring the long-term residents of a building that their days in their home are numbered. In addition, there is also the epidemic of rent overcharge in rent stabilized buildings, many of which receive tax exemptions like J-51 abatements. These are standard, sometimes legal but more times than not fraudulent, tactics used by Inwood’s newest landlords to displace long-term residents.

The cost of this process is not captured well in terms of dollars, but rather it is the human cost that we have to attend to at this hearing. Destabilized rents inevitably lead to deregulated apartments, and the combination of increased rents and deregulated apartments lead to destabilized communities. As your office evaluates this plan you must consider how it will interact with and impact this market reality of precarious rents we describe here.

For our clients, the prospect of rezoning has the potential to be as dangerous to their community as the plan itself has the potential to be if implemented. We have witnessed how the mere *proposal* of rezoning has led certain landlords of enormous means to speculate on the value of Inwood buildings. We have

¹ Hernandez, Ramona, et al. When a Neighborhood Becomes a Revolving Door for Dominicans: Rising Housing Costs in Washington Heights/Inwood and the Declining Presence of Dominicans, p. 3.

² <https://streeteasy.com/building/87-park-terrace-west-manhattan/6f>

collaborated with the office of the Borough President to conduct a Know-Your-Rights and Tenant advocacy campaign in reaction to one of these landlords, who, in January of 2017, purchased 13 buildings in one sweep, for about \$60 million. Those buildings contained about 360 units. Every apartment in those buildings was rent stabilized when this purchase was made.

The landlord has been doing everything possible to increase the rent to make a profit on these buildings and service their financing. Between the date of purchase in December 2016 and January 2017, this landlord has begun court proceedings against 25% of its tenants. We have seen this landlord initiate a series of identical MCI applications in all 13 buildings and compound with them with IAs with vacancy increases after tenants are evicted to produce more market rate, unaffordable units. One of the more despicable tactics we have seen on behalf of this landlord and others is bringing questionable eviction cases against families who have been living in their apartments for 10, 20, 30, or even 40 years based on information gathered about other people with the same Latinx names who live in other states as the basis for cases alleging that the named tenant does not live in the apartment full-time and should be evicted. Another new landlord in Inwood that began buying properties in 2014 had commenced proceedings against 53% of its tenants by 2017. Landlords all over Inwood have picked up these kinds of tactics, many of which target the largely Latinx Spanish speaking Inwood residents. As you know, the density of the stabilized apartments in Inwood is unparalleled in our city, but it will not stay like this for long if such activity continues unabated.

Market speculation triggered by proposed rezoning incentivizes landlords to displace rent regulated tenants in favor of higher rent paying tenants. If upzoning is passed, these issues will only be exacerbated. This has the potential of transforming the demographic composition of the neighborhood, and the impact of this change, beyond displacement, will not be confined to Dyckman Street at the southern end or 218th Street on the northern end.

The current rezoning proposal aims to preserve the stabilized stock, albeit without explicit proposals as to how this will be achieved, and aims to create new affordable housing units in the future. Under the

current proposal this new stock of affordable units will not be accessible to most of the neediest families and individuals who currently live in Inwood. There are two main reasons for this. First, as community members have noted in previous hearings—the numbers in the current proposal do not match the income demographics of today’s Inwood—this is why so many of the activists continue to ask: *affordable for whom?* Secondly, the aforementioned causes of displacement work fast, and precipitously. This leads us to ask whether any *truly* affordable units can be constructed before the displacement actually occurs, and if not, where will the families pressured out of their apartments go? If the new units are not paired specifically for the access of those most at risk of displacement then what will be the net gain of the proposal? Building additional units is not a safeguard against an overwhelming attack on tenants, especially when those new units aren’t affordable to current residents.

The analysis in *When a Neighborhood Becomes a Revolving Door for Dominicans: Rising Housing Costs in Washington Heights/Inwood and the Declining Presence of Dominicans*, provides us with an understanding of who is most vulnerable to displacement. It is those who spend most of their incomes on rent who are more susceptible to life’s uncertainties—and in the context of Washington Heights and Inwood we see this through various patterns. Between the year 1999 and 2014, the number of White households who were rent burdened decreased by 5%; while for African American, Dominican, and other Latinx households, the number of households that were rent burdened increased by 20%, 8.7%, and 36% respectively. In other words, working-class families of color and first generation families are spending more money on rent today than they ever would have imagined 20 years ago—and the cost is only going up. Because of trends such as this one, it is far from a prediction to calculate that the net effect of this proposal will be one of higher rates of displacement among working class people of color from Inwood. Considering the fact that Inwood and Washington heights are home for predominately immigrant families and people of color, their vulnerability to displacement will have the potential to transform this neighborhood into a different place.

Federal housing policy in America was based on discrimination. Even the laudable aims of the New Deal had racist stereotypes and the ideology of segregation entrenched across all housing stock in nearly

every State. New York was not an exception to this rule. Neighborhoods like Inwood have historically suffered from disinvestment because of such housing policies and their perpetuation. When we look at the success of Inwood and its unwavering vibrancy, we must note that this place is what it is today because incredibly resilient working class residents stayed and withstood that disinvestment and disregard. This is what makes our city have the neighborhoods that we have – in terms of business, culture and community—it is resilience, and sometimes resistance, which has allowed them to stay havens of proud working-class residents.

Considering this history, it is not surprising that so many residents have come together to express their grievances and concerns about the proposed rezoning. When we speak to our clients about the neighborhood changing we hear anger and dismay, because despite this history of disinvestment and inadequate resources, now the city wants to shake things up and “revitalize” Inwood in a manner which they believe will either directly exclude them, push them out, or just ignore their needs.

Should these residents be forced into a position in which they have to accept the negative aspects of this proposal in order to acquire the positive elements it promises? Community improvements cannot remain contingent on rezoning policies, especially in neighborhoods where New Yorkers already have to struggle to pay rent, attend the most segregated schools, and contend with racist policing.

Paradoxically, if this plan is approved, Inwood’s landlords and future developers can prepare for a windfall of revenue—even though they have kept many of these buildings in horrible conditions for years. This past year we dealt with far too many intransigent landlords who failed to tend to elevator outages although their elderly or disabled tenants depended on such maintenance. Total lack of heat in the peak of winter was common, and now the new trend is discontinued cooking gas for months. It should not be surprising that this community has aimed to persuade the city to change this proposal—community improvements such as affordable housing, bigger libraries, better school resources, efficient public transportation, and community land trusts can be created without upzoning across Inwood — it should not be an ultimatum.

At LSNYC, and especially in our Inwood community office as tenant advocates we ask ourselves, *who is this rezoning for?* We are apprehensive that it is not for the current community, nor is it for the current small businesses or the tenants, but rather it is for developers and the more affluent newcomers they are banking on. Inwood and communities like it are entitled to continuous and consistent investment by the city, not investment that hinges on rezoning. The array of tactics waged by the frenzied Inwood landlords is already directed at driving out many of our clients and their neighbors and we believe this will worsen if the rezoning is approved. Further, we cannot ignore the chilling effects of rezoning in other neighborhoods like Williamsburg and East Harlem, where long term working class residents of color have been pushed aside or driven out because of nefarious tactics by landlords and skyrocketing housing costs. Further, while LSNYC appreciates the City's funding of legal services and organizers for Inwood and we hope that it continues, we alone cannot stem the displacement unleashed by the rezoning. Inwood residents are in need of affordable long term housing for themselves, their families, and to ensure that Inwood remains a diverse and thriving community and this city can preserve its reputation as a cultural melting pot.

We believe that our clients and the broader Inwood community deserve all the investments that ride on the coattails of rezoning and that they shouldn't have to face upzoning, displacement and heightened gentrification to receive that long overdue investment from their city. On behalf of Manhattan Legal Services and Legal Services NYC we thank you for your time and for giving us the opportunity to testify here today.

Sincerely,

Rita Vega

Staff Attorney, Tenant's Rights Coalition

Manhattan Legal Services

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New York, NY, 10034

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Email: rvega@lsnyc.org

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BLUDLOW

July 10, 2018

Subcommittee on Zoning and Franchises
NYC City Council
Council Chambers – City Hall
New York, NY 10007

FOR THE RECORD

Re: Edison Properties Public Comments on the Inwood Rezoning Proposal

Dear Chair Moya and Committee Members,

I write to you on behalf of Edison Properties, owner of four properties within the proposed Inwood Rezoning Area. These sites are 5030 Broadway, 3976 Tenth Avenue, 270 Dyckman Street, and 290 Dyckman Street. Edison Properties is the parent company of several operating businesses in Inwood, including Manhattan Mini Storage, WorkSpace and Edison ParkFast. We hope to convey our specific concerns as businesses who also own the buildings they occupy.

In general, we support the current amended zoning map and zoning text applications for the Upland Wedge subdistrict. However, we want to express our continued concerns regarding the proposed zoning for Dyckman Street west of Broadway in the Upland Core.

Proposed "Upland Core"

The Upland Core includes all areas west of Tenth Avenue, excluding the Upland Wedge and Commercial "U" subdistricts. The existing zoning is comprised almost entirely of R7-2 zoning districts, some of which are also mapped with C1-4 or C2-4 commercial overlays. The major exception to this residential zoning is the C8-3 zoning district mapped along Dyckman Street west of Broadway.

Edison operates two businesses on Dyckman Street west of Broadway on property it owns. There is an Edison ParkFast parking garage at 270 Dyckman Street, which serves as a neighborhood parking facility. In addition, there is a Manhattan Mini Storage self-storage facility at 290 Dyckman Street; this building had been long-vacant prior to Edison's acquisition in 2012. Both facilities are extensively used by local residents and businesses.

Dyckman Street west of Broadway is substantially different in zoning and land use from the rest of the Upland Core subdistrict. It is the only commercial district in the Upland Core. The lots fronting the south side of Dyckman Street between Staff Street and Broadway ("West Dyckman") are relatively deep and are split between two zoning districts: a C8-3 zoning district mapped along Dyckman Street (to a depth of 100 feet) and an R7-2 district. The depth of these lots requires that they comply with both sets of zoning district regulations. There are no existing residential uses, but only commercial, light manufacturing and automotive uses.

Unlike other areas of Inwood that the City proposed to rezone early in its engagement with community stakeholders, less attention has been paid to understanding the existing land use conditions along West Dyckman. Details regarding the proposed zoning for West Dyckman were made publicly available less than one month prior to the City's release of the Inwood Rezoning Proposal EAS and DSOW.

Edison's Proposed Modification to Rezoning

The City's rezoning proposal for West Dyckman, both the original and amended, does not consider specific land use and development conditions that exist and make it distinct from the rest of the Upland Core subdistrict. For many reasons as explained below, the proposed zoning for West Dyckman will not result in new residential or commercial development. Additionally, the proposed rezoning will make it more difficult for the existing businesses to operate. Therefore, the three blocks bounded by Dyckman Street and Riverside Drive, between Staff Street and Seaman Avenue, should not be rezoned and should be removed from the Inwood Rezoning Proposal. The zoning for this area should be left as is.

Site specific conditions along West Dyckman create development challenges. The existing split lot zoning, in place since 1961, requires sites to comply with zoning district regulations for both use and bulk. The parcels that face Dyckman Street range in lot depth from approximately 189 feet to approximately 140 feet, requiring them to comply with both C8-3 and R7-2 zoning district regulations. Many of the buildings in this specific area were built prior to the 1961 zoning and span both zoning districts. Additionally, while elevations are relatively level along the Dyckman Street frontage, there is a significant grade change between Dyckman Street and the south lot lines. For instance, along Henshaw Street the sidewalk elevations are approximately 15 feet higher at the site's southern edge than at the intersection with Dyckman.

Under the current zoning proposal, future development on Dyckman Street fronting properties would still have to comply with regulations for two zoning districts – the proposed C4-4A/MIH/ID and the R7A – within a single project. The proposed densities are insufficient to make redevelopment of the sites economically feasible for new residential or commercial buildings. Further, almost all the existing buildings are full lot coverage on deep parcels, which makes them unsuitable for residential use. In addition, many of the businesses along West Dyckman own their buildings and would not even be able to enlarge their existing operations under the C4-4A zoning regulations because they are not permitted uses. Edison has recently invested significant resources into renovating its buildings for the existing operating businesses.

West Dyckman consists of commercial and light industrial buildings and uses that provide services to the surrounding neighborhood. These uses are conforming under the existing C8-3 zoning, which recently led Edison to make significant capital investments in both of its Dyckman Street properties. However, almost all existing land uses would become non-conforming uses under the proposed rezoning. Further, the City proposes to place e-designations on projected and potential development sites within the rezoning area. While e-designations may make sense to ensure future new construction occurs appropriately, they present unnecessary permitting requirements for routine

approvals related to the upkeep and maintenance of existing buildings that are unlikely to be redeveloped.

The existing businesses on Dyckman Street are thriving businesses that provide services to the neighborhood, and the proposed rezoning would make business operations more difficult. Further, the proposed rezoning would not encourage redevelopment of these properties into mixed-use development given the specific site conditions, viability of existing uses, and densities proposed. The blocks south of Dyckman and west of Broadway should be left out of the rezoning until such time that redevelopment is a possibility. This would allow for a more focused and comprehensive conversation with the community regarding uses, densities and building heights that would be appropriate for this area.

Thank you for your consideration of our comments and concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Anthony Borelli". The signature is written in a cursive, slightly slanted style.

Anthony Borelli
Vice President, Planning & Development

Testimony of John Krinsky, Professor of Political Science, City College and CUNY Graduate Center

Inwood Rezoning Hearing, City Council

July 10, 2018

Good afternoon members of the Council. Thank you for the opportunity to present this testimony. My name is John Krinsky. I am a professor of political science at the City College of New York, where I have taught since 2002, and at the City University Graduate Center. I have a master's degree in urban planning and a doctorate in sociology from Columbia University.

In the context of this rezoning, the President of City College, Dr. Vincent Boudreau was asked by Council Member Rodriguez to convene interested faculty members to assess the rezoning proposals for Inwood. I had not anticipated getting as deep into the task as I have subsequently done. For years, I have been involved in the fight for affordable housing in New York City, but have largely stayed out of the details of rezoning proposals, as I have had no official role through which to study them. This testimony reflects my research on this issue, but not an official position of City College, its president, or Council Member Rodriguez. I have submitted a full working-paper as written testimony.

In looking at the proposals for Inwood, I found that the current planned rezoning presents significant dangers to the low- and moderate-income renters, in part because it proposes to do very little to protect them, and in part because it does not even likely replace the available housing that will be lost to this group, whether or not the rezoning goes through. Further, incentives for further "market-rate" development will only exacerbate the existing risks.

Inwood faces severe displacement threats even before the proposed rezoning. These are well known but are mostly ignored in the EIS, as required by the CEQR manual, which considers rent-regulated tenants to *not be* at risk for displacement. Since 70 percent of Inwood residents are rent-stabilized tenants, their significant risks cannot be overlooked.

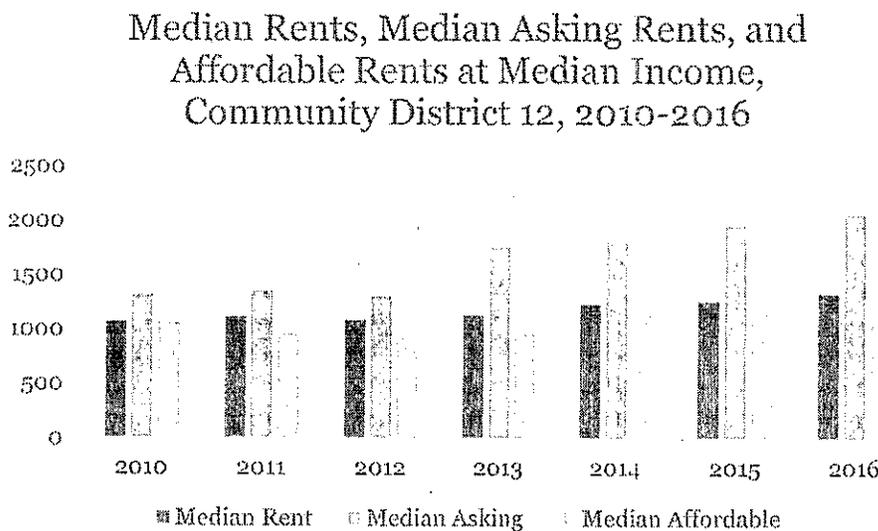
- Thirty percent pay preferential rents.
- According to the Furman Center, in Community District 12, median asking rents are, at \$2,050, *\$720 a month more than median rents, or more than 50 percent higher.*
- Large landlords with multiple buildings in the neighborhood have capitalized their buildings in ways that push the rents up, often above the median asking rent.
- Since 2013, the neighborhood has seen a steep climb in median and median asking rents, jumping \$450 per month from 2012 to 2013 and an additional \$300 from 2013 to 2016.
- Since 2013, the percentage of Latino/a residents of Community District 12 has begun to decline and the median income has risen.
- 80 percent of cases in Manhattan Housing court are from Upper Manhattan, and at least one large landlord is significantly more aggressive in bringing eviction cases in Inwood than in the rest of its portfolio citywide.

My testimony highlights several things, taken most broadly. First, it argues that we have to understand that tenants are not displaced by an abstraction called "the market," but by landlords. It is thus important to model landlord behavior when assessing displacement risks. Second, among those at *greatest risk* are rent-regulated tenants, since landlords have

become aggressive in trying to deregulate their apartments in part by increasing turnover. According to the Association for Neighborhood and Housing Development's Displacement Alert Project, 1,153 units were taken out of rent regulation between 2007 and 2016. Third, we need to look at the capitalization of the buildings in the neighborhood and focus, particularly, on the Gross Rent Multiplier (GRM), a measure of the ratio between the sales price of the building and its total rents. The large portfolios of several Inwood landlords have GRMs that would require them to set rents at levels significantly higher than those that prevail in the neighborhood.

This all being said, Inwood remains a relatively affordable neighborhood, and probably one of the last. Figure 1 indicates some of the threat.

Figure 1.



My testimony concludes with the following recommendations:

- *There should be no rush to rezone Inwood.* With the City Council and Mayor's charter revision commissions in the process of taking public comment about proposed changes to the City Charter, it would be surprising if suggestions for changing land use procedures is not one of the foremost concerns of city residents. Specifically, the failure of the CEQR manual to specify that the required EIS take account of rent-stabilized housing is, given what has been presented above, a gaping hole in our ability to predict and understand the dynamics of displacement. That Inwood is still so deeply rent-regulated shines especial light on this problem. Approving a rezoning without a thorough study of displacement dynamics focused especially on landlord behavior seems both premature and frankly, negligent.
- *No rezoning should proceed in Inwood until HPD devises a new term sheet that is geared toward local—Community District-level—income distributions with some adjustor for fair housing.* In this way, low- and moderate-income communities of color would not fall victim to gentrification-by-affordable-housing as has been the case in previous rezonings and with significant portions of non-mandatory affordable development under both this and the previous administration. It would also temper the

speculative impulse in such neighborhoods while allowing for measured redevelopment with responsible owners.

- *No zoning should proceed without a solid and staffed Partners in Preservation Program already on the ground.* This program must take into account the risk factors elaborated in this working paper, and have access to the data that are, at this moment, hard to come by.
- Any risk assessment that does not focus on landlord behavior, but rather adheres to an older model of displacement risk by landlords who simply cannot keep up with the cost or demands of their buildings and tenants who are priced out by “the market,” will fundamentally miss what is happening in Inwood and will be unprepared to deal with the fallout from rezoning. HPD cannot be left to do this risk assessment on its own but must do so with community groups who are already working to help tenants in danger of displacement stay in their homes and ensure that they are safe.

I'd like to close on a note of reflection about the rezoning process. It seems that we have not, as a city, distinguished well between going through the motions and actually doing due diligence. That we officially treat rent-stabilized tenancies stable, given the changes to rent regulation and our accumulated experience around gentrification and displacement, rising and epidemic levels of homelessness, tenant harassment, rent overcharges, and the like, boggles the mind. That we don't insist on stopping the bleeding of our neighborhoods before inflicting potential new wounds—even if they have all the best intentions behind them—given what we know, boggles the mind. That we don't make it easier to study residential displacement risks and that it doesn't seem to be a real priority except among several housing nerds in the city is an indication that our attachment to communities, even among some self-professed progressives, may be more sentimental than real.

Thank you.

Inwood Rezoning and Housing Displacement Risks

Testimony Submitted to the New York City Council, July 10, 2018

JOHN KRINSKY, PROFESSOR, THE CITY COLLEGE OF NEW YORK

Introduction

Good afternoon, members of City Council. Thank you for the opportunity to present this testimony. My name is John Krinsky. I am a professor of political science at the City College of New York, where I have taught since 2002, and at the City University Graduate Center. I have a master's degree in urban planning and a doctorate in sociology from Columbia University.

In the context of this rezoning, the President of City College, Dr. Vincent Boudreau was asked by Council Member Rodriguez to convene interested faculty members to assess the rezoning proposals for Inwood. I had not anticipated getting as deep into the task as I have subsequently done. For years, I have been involved in the fight for affordable housing in New York City, but have largely stayed out of the details of rezoning proposals, as I have had no official role through which to study them. This testimony reflects my research on this issue, but not an official position of City College, its president, or Council Member Rodriguez.

In looking at the proposals for Inwood, I found that the current planned rezoning presents significant dangers to the low- and moderate-income renters, in part because it proposes to do very little to protect them, and in part because it does not even likely replace the available housing that will be lost to this group, whether or not the rezoning goes through. Further, incentives for further "market-rate" development will only exacerbate the existing risks.

The following testimony suggests putting off any rezoning until we better understand the dynamics threatening low- and moderate-income residents in Inwood. Because there is such a high density of rent-regulated housing, and because the CEQR manual does not permit the consideration of rent-regulated tenants as at-risk for displacement, the potential problem has not been taken seriously enough. Moreover, misunderstanding the "market" and its dynamics, and failure to look at both the behavior of landlords and lenders leads to a basic underestimation of the risks already faced by neighborhood residents.

Assessing the rezoning plan for Inwood for its effects on affordable housing in the neighborhood immediately shows a neighborhood *already* in transition. The last five years have seen an influx of white residents, a slight decline in the percentage of Latino/a residents, a rather sudden jump in the median household income, a distinct spike in asking rents, and a corresponding, though still attenuated increase in median rents. In short, Inwood is in a process of gentrification, but remains a neighborhood that is still *largely* affordable to many of its residents, but with that affordability increasingly threatened.

The assessment that follows asks several key questions that should be considered carefully when thinking about the benefits and costs of rezoning.

- Given the existing threats to stability and affordability, would a rezoning add to the threats or mitigate them?
- What do we know—and what can we know—about the forces that put residents in danger of being displaced?
- How do we start to study and understand possible spillover effects of the rezoning to other areas in the community district that are not subject to rezoning?

In what follows, I draw on data collected from the Furman Center, the Department of Housing and Urban Development, and the Association of Housing and Community Development (ANHD) "Displacement Alert Project" database (hereafter, DAP) and other research to create a profile of the community district's changes and housing threats over time.

I then propose a more detailed model of displacement risks that draws on landlord behavior, for which I am still collecting data (there was insufficient time to complete this before this hearing). Part of the problem is that there are data that are difficult to obtain at all, much less in a timely fashion, that would likely give a greater sense of which tenants were in danger of displacement and where. It is premised on the idea that markets are *social institutions* rather than some abstract plane of existence where supply and demand curves meet and tend toward optimization. Indeed, in a highly regulated environment with extremely durable goods, the latter approach would be absurd. Instead, we must come to terms with the fact that tenants are not displaced *passively*, but that quite often, they are displaced *by landlords* who, in pursuit of profits, hike up rents, and sometimes go to significant lengths—both legal and not—to do so. Further, they do so with the help of—and in debt to—lenders whose institutions are bounded very differently, both from a geographical and regulatory point of view. If we should have learned anything from the financial crisis of 2007 it should have been that housing markets are also debt markets and that the primary actors in both—landlords and lenders—are less and less beholden to specific places and to the people who live in them. If they can, through regulatory means, *change the people who are buying in any given geographic location to their advantage*, they will. *But unless we get serious about understanding the risks that the model suggests, we should not pretend that we are taking the risk of displacement seriously.*

What we know

Gentrification

Inwood is the process of gentrification and with gentrification comes a threat of displacement; whether this displacement is from a home—i.e., an apartment in a neighborhood building—or from the immediate neighborhood, the larger neighborhood (Washington Heights-Inwood), or from the City itself is difficult to track. But it is clear that low-income residents facing rising rents, high rent-burdens, and evictions are at least at greater risk of displacement and, if they are not displaced, face increasing hardship in place. Neither is a good outcome.

Some indicators of gentrification are a trend of a widening gap between median and asking rents. Data are readily available only for Community District 12 (Washington Heights-Inwood) as a whole, but the picture is both significant and corroborated by spot-checks on buildings in Inwood on Streeteasy and other real-estate websites (Figure 1).

Gentrification is also usually understood as the replacement of a lower-income population, usually people of color, with whiter, richer people in the neighborhood. The data bear this out, as well, as we see a spike in the median income of the neighborhood (Figure 2) and a decline in the percentage of Latina/o residents, though Washington Heights-Inwood retain a significantly Latina/o and specifically Dominican character (Figure 3).

Figure 1.

Median Rents and Median Asking Rents, Community District 12, 2010-2016

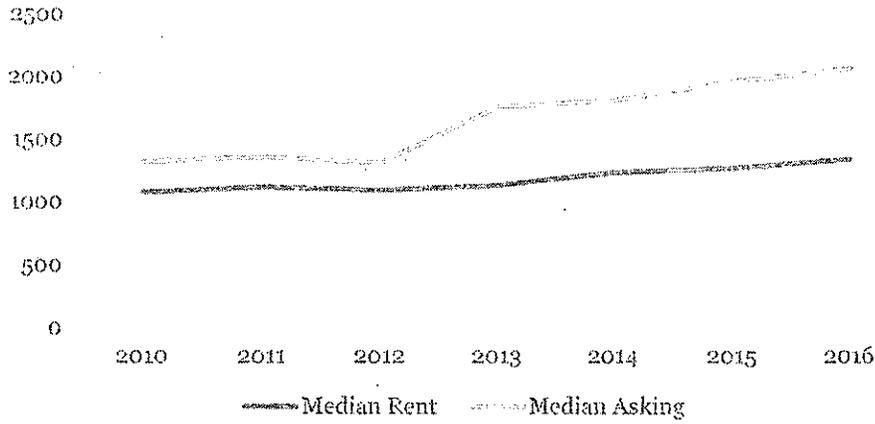


Figure 2

Median Income Community District 12, 2010-2016

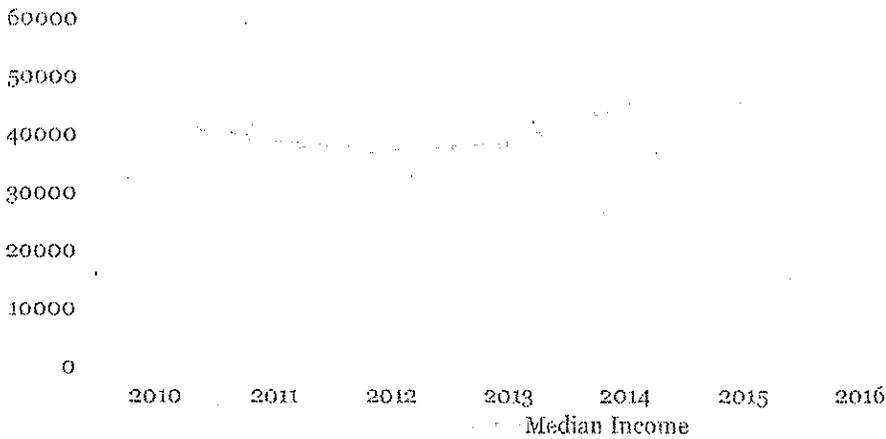
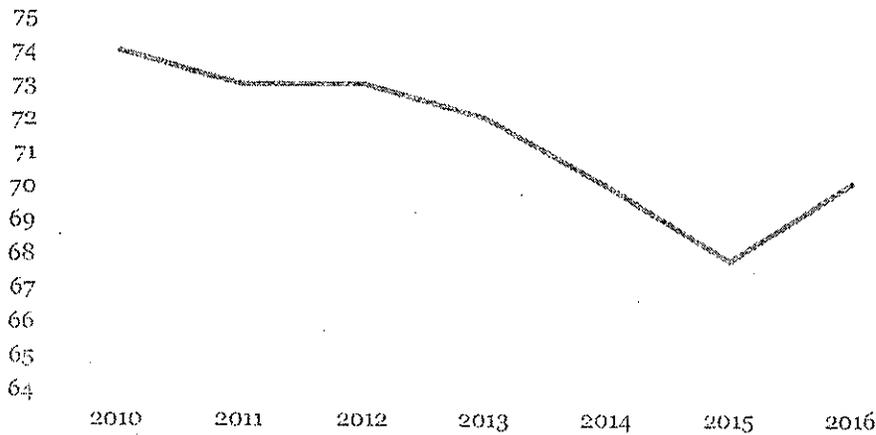


Figure 3

Percentage Hispanic Origin
Community District 12, 2010-2016



In all three figures, we see 2013 as an inflection point: median asking rents jumped, median income started to increase, and the Latina/o population began to decline. Nearly all of the decline, furthermore, was made up in White movers into the neighborhood.

While it is entirely possible, of course, that the decline in Latina/o presence—still a small decline in percentage terms—is simply voluntary, the dynamics of asking rents make this interpretation highly suspect.

Displacement risks

If we look more deeply at the data, we can make some more observations that help us to understand the risks tenants face.

Figure 4 shows the shortfall between a rent affordable at 30 percent of median income and the asking rents in the neighborhood. Some background here is also important: More than 60 percent of the neighborhood's housing stock is rent-regulated but an estimated thirty percent of renters are paying "preferential rents" that are lower than legally allowable rents but can therefore be hiked to the allowable rent on a new lease. This can leave renters vulnerable to having to go from a rent that is close to the median—and close to affordable—to having to pay the "asking rent." Thus, Figure 4 is a significant indicator of vulnerability, particularly as the ability of many of these renters to afford housing elsewhere in the City is very low.

Figure 4

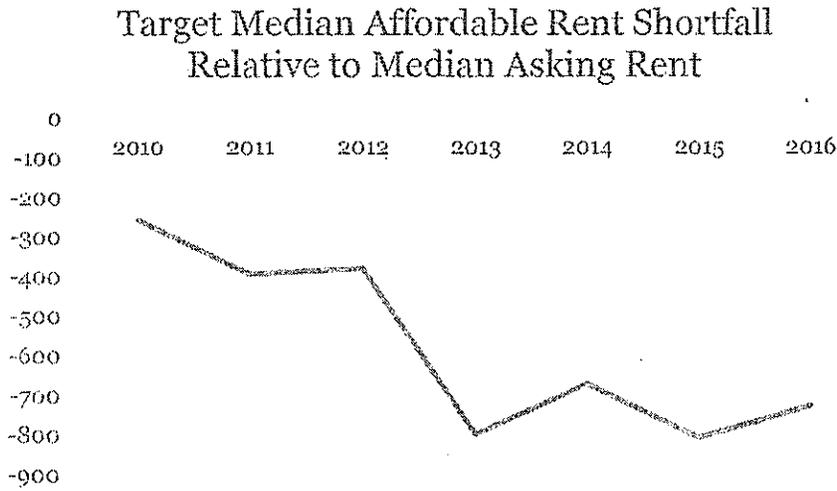
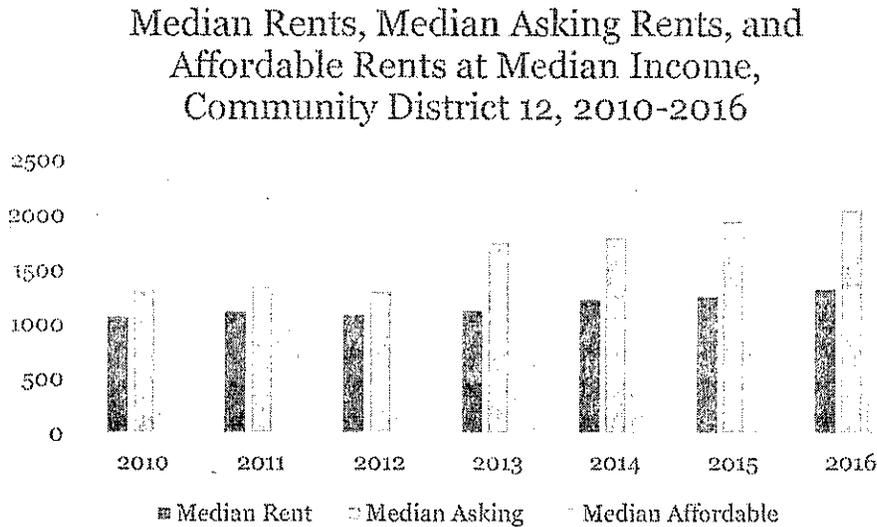


Figure 5 represents these data somewhat differently, comparing median rents, asking rents, and rents affordable at the neighborhood median income (at 30 percent of income).

Figure 5.



To put this into some perspective, 25.3 percent of Community District 12 had household incomes below \$20,000 in 2016. The *shortfall* of \$723.75 per month between the median affordable rent in the neighborhood and the median asking rent is 30 percent of the income for households making \$28,950 per year. Of course, this *also* means that median rents for the neighborhood are *already* out of reach—and have been for a long time—for a full quarter of the neighborhood’s residents, which is why the Furman Center finds that in 2016, 45.5 percent of low-income households were severely rent-burdened (paid more than 50 percent of their

incomes on rent) up from 41.6 percent in 2010, and that neighborhood-wide, the figures for 2016 were 32.3 and for 2010, 30.2 percent.

Tom Waters of CSS calculates that even if no rezoning happened, there would be about 9,100 people moving within the area and within a ½-mile radius of the zoning district every year, which means that most will have significant problems affording housing in the neighborhood or in the city as a whole. If rents go up in the area—and beyond the zoning area itself—as a result of rezoning, this difficulty will get even more significant. (Waters bases this on ongoing patterns of moving, but it is significant, too, that nearly the same number of renters have preferential rents in the neighborhood).*

If we take a closer look at the data, we can begin to see some clearer signs of displacement risks. For example, in ANHD's annual report on risks to affordable housing, Community District 12 has consistently been in the top 20 and ten community districts in the city in housing court litigations. In 2017, it was second in the city. And yet, *in 2017, Community District 12 did not score among the highest 20 in the percentage of households paying more than 30 percent of their incomes on rent* (rent burden) in spite of the large numbers of both all residents and low-income residents who are *severely* rent-burdened.

What does this suggest? It suggests both that landlords may be being extra-aggressive in bringing housing-court litigations against Community District 12 residents and/or that these litigations are targeted at those least able to pay rent—and even less able to pay the new, inflated asking rents in the neighborhood. In any case, it begins to do what we must: train our attention to landlord strategies.

Displacement Risks: A New Model

Background

It is critical to understand that residents of rent-regulated apartments *are not* protected from displacement risks. The CEQR manual's guidelines for studying displacement suggests that they are, but the manual was completed in 1993, prior to (and nearly contemporaneously with) a change in rent regulation first enacted in City Council and then made permanent in state law four years later. (And while the manual has been updated several times through 2014, its rule not to consider rent regulated tenants in displacement analysis still stands.)† The change in rent regulation allowed for vacancy bonuses and luxury decontrol, meaning that landlords could hike up their rents by 20 percent on new leases (rather than *renewed* leases) and could pull their units from rent stabilization completely when the unit's rent exceeded \$2,000 per month. The latter number has since been adjusted upward to \$2,700 per month. In any case, these changes incentivized rent-regulated landlords to turn over their units as often as possible. This added to an already available strategy of hiking rents due to major capital improvements (MCIs), a portion of the value of which can be added to the base rent even after the expense of the MCI has been amortized.

It is important to understand both the issue of deregulation and the neighborhood and market conditions in assessing risks of tenant displacement. In neighborhoods where rents are

* Tom Waters, "Profiles of Rezoning Study Areas," typescript.

† See Renae Widdison, *It Matters How We Count: Understanding the Methodology used to assess Indirect Residential Displacement in New York City's City Environmental Quality Review Technical Manual*. Master's thesis. Pratt Institute, 2018.

increasing rapidly, it may be a sign that landlords are paying significantly more for their properties than earlier landlords did and are hiking rents accordingly. As this appears possible, other property owners will follow suit, sometimes ignoring the limits set by rent regulations, and sometimes by removing preferential rents.

It may also be that landlords are buying property speculatively, paying significantly more for the property than its rent roll will support at its current levels. Typically, property firms that do this can absorb losses for a while and therefore tend to be larger firms.

Financial vulnerability indicators

The Association of Neighborhood and Housing Development (ANHD) has suggested that the sales price divided by the annual rent roll—the Gross Rent Multiplier (GRM)—serves as a good indicator of financial vulnerability, with speculative buying beginning with a GRM of 11 or more.* GRMs are useful statistics because they can give a guideline for what average rents *should be* at GRMs set at specific points.

Accordingly, one way of tracing financial vulnerability would be to get the sales prices for every building in the neighborhood for the last two sales, and then compare the target rents at a GRM of 11 and see how much this differs from, for example, the median rent in the neighborhood for the same years.

Scraping ACRIS for *all of* the last sales of buildings in Inwood zip codes is time-consuming and beyond what we could produce to this point. But if we look only at buildings sold (where deeds were transferred) from February 2017 through April 2018 in zip codes 10034 and 10040, we can see that the median rent at a GRM of 11 is \$1953.28, which is just less than \$100 below the median asking rent, and \$623.28 *above* the median rent. *Thus, we can see that the new sales in the neighborhood are geared toward the asking rents and rely financially on rents that are far above the median.*

The same story can be told for properties with “spreader mortgages” across numerous properties. For example, one portfolio, including a *dozen* properties, mainly in Washington Heights-Inwood—but one in Queens—and four in the rezoning area and another three just outside it, has a single mortgage of \$243,649,710, covering a total of 937 units. At a GRM of 11, this comes out to \$1,970 per month as a target rent. Again, this is nearly 50 percent more than the median rents in Community District 12.

Ideally, we could find out the *actual* GRMs for the buildings, but actual rents are not available on a building-by-building basis, and only tenants can get information about their own rents.

Another indicator of financial trouble—and possibly, other trouble—in rental housing is the incidence of tax arrears. When building owners stop paying taxes and water bills, they are often

* Historically, average GRMs fluctuate considerably. See <https://realestatevaluation.wordpress.com/2009/09/03/a-little-bit-of-history-gross-rent-multipliers-in-new-york-city-over-time/> What is particularly striking is that GRMs of 11 are, from the point of view of New York City’s history, quite high. Just prior to the financial crisis in 2007, GRMs “peak[ed] at more than 15 times gross annual rental income,” with previous peaks at below 10. Accordingly, by adopting a baseline of GRM 11, we are here taking for granted a significant degree of speculation as the “new normal.” In both historical terms and for the lives of low-income tenants, a GRM of 11 should not be treated as normal but as a dangerous aberration.

not paying for basic repairs, either. Historically, this has been the case where cash flow is weak, since nonpayment of taxes and water fees can result in the sale of tax liens and ultimately foreclosure or pressure to sell the property for less than its market value. In 2013, Community District 12 was the *only* community district in Manhattan with a top-ten incidence of residential properties with tax arrears in the top ten, as ranked by ANHD. Just over one in twenty (5.4 percent) of buildings had one or more years of tax or water arrears.

If combined with high GRMs, tax liens may be an indicator of overleveraged buying—when a property owner’s calculations of expected profit outstrip their ability to realize it.

Finally, we can potentially understand more about landlord strategies if we understand what else is in their portfolios. If landlords consistently buy buildings at GRMs that are extremely high, that should be a warning sign that they do not intend to run the buildings in a manner affordable to current tenants.

Material strategy indicators

Another way of turning over apartments is making the living conditions so bad that tenants want to leave. Upon vacancy, again, building owners can hike up rents and also apply MCIs as they renovate the very buildings that they have let slide into disrepair.

Not making repairs or doing adequate maintenance is also, of course, a possible business model regardless of vacancy bonuses and incentives for turnover. What is not spent on repairs and maintenance can be put toward profit or toward more building purchases. Either way, tenants suffer and consider moving.

The main indicators of disrepair, again, gathered by ANHD’s Displacement Alert Project are complaints and violations lodged with and issued by the Department of Housing Preservation and Development (HPD). ANHD’s DAP reports show buildings that have new complaints and violations each month, and a different database, the proprietary Building Indicator Project (BIP) shows quarterly reports on how many violations and of what sort remain open (i.e., unresolved), though for a different but overlapping set of buildings.

Almost paradoxically, building owners can also use *renovation* as a way to harass tenants by creating noise and dust conditions, leaks, and other nuisances designed to drive tenants away. Hence, the DAP reports include filings by building owners for permits from the Department of Buildings.

A distinction between the HPD complaints and violations and the DOB permits, beyond the obvious, is that it is most often tenants’ collective action that leads to the filing of HPD complaints and the dispatch of inspectors, while the DOB permitting process is initiated by the landlords. Thus, there is some selection bias in the first measure, since it is not necessarily more likely to pick up buildings in poor condition, but certainly more likely to select buildings whose tenants are organized.

For some buildings in areas undergoing rezoning, the recently expanded Certificate of No Harassment (CONH) holds out some hope for tenants. Under the program, certain landlords, including those already found to have been harassing tenants, have to apply for a CONH and HPD will contact tenants and former tenants to ensure that there has been no harassment. In the event that there is, landlords will be denied building permits for a period of five years. To

understand the effect that CONH will have on indicators of harassment—or whether they will result in fewer permits being sought—is still unclear.

Regulatory strategy indicators

The DAP website, as well as the justfix.nyc website list for each address the number of units that have been deregulated, or, in the rarer instance, regulated between 2007 and 2016. Many deregulated units in a building may be an indicator of the building-owner's strategy, but it may also be an indication of the *history* of the building prior to their ownership. Using ACRIS data, it should be relatively simple to see whether a given building owner or a preceding owner is aggressively moving units to deregulation, a move that is certainly threatens tenants with displacement and makes it very unlikely that the unit will be re-tenanted by a household of equal or lesser means than the previous occupant.

Justfix.nyc's website also lists the *other* buildings in a given building-owner's portfolio, and the proportion of deregulated to total units in a whole portfolio may also be an indicator of a building-owner's overall strategy: even if one or another building does not have many deregulated units, the other buildings in the portfolio may portend what is to come.

Litigious strategies

One of the greatest dangers for tenants fearing displacement is obviously eviction. Significant numbers of evictions per unit in a building can indicate how aggressive a building owner is in trying to turn over apartments. But in addition to “marshals' evictions”—i.e., eviction cases in which the Marshals have been ordered to carry out the eviction, there are ways in which landlords use the courts to harass and threaten tenants. Specifically, they will bring many more eviction *cases* than they are likely to win, either to prepare the way for future successful evictions (e.g., when tenants do not live up to stipulations to which they agree under pressure from landlords' lawyers) or simply to pressure tenants to leave.

Similar to the expansion of the Certificate of No Harassment program, the city council recently passed a citywide right to counsel in Housing Court. While not everyone is income-qualified for a free attorney, the right to counsel is anticipated to reduce significantly the number of eviction cases landlords bring against tenants overall. Also similar to CONH, the rollout of the right to counsel is likely to hit some speed bumps and its effect on eviction cases is not known yet.

Other indications

Other indications of landlords' efforts to dislocate tenants include hiking up preferential rents and making buyout offers. Neither is easy to track, and therefore are nearly impossible to use as “indicators” even though we know that they are common.

Integrating the Indicators

Aggregation across time and ownership

There are a number of possible ways to integrate the indicators. For one, we could simply list them, as ANHD does, and suggest that risks are severe when a certain number of indicators appear in a given month (or over a given period of time), and less severe when fewer do. This makes sense as a first cut at the data, but it does not necessarily give us any leverage over landlord strategies. It suggests, indeed, that all tactics are available at all times and that all landlords will essentially act in the same ways. This is, however, testable, and it makes sense to do so, lest we overplay some risks and downplay others.

Another would be to look at properties over a longer period of time. Ideally, we could have a window of several years *before* and *after* a rezoning was first announced to understand whether or not the anticipation of rezoning has an effect on landlord strategies, or conversely, whether initial moves to gentrify an area trigger rezoning plans. Short of this, looking at properties at an interval of greater than one month at a time seems advisable. To get at overall strategies, it would be best to look at each property over the course of their ownership by particular landlords within a window of at least several years.

Properties could also be grouped by ownership to see whether landlords follow consistent investment strategies across their buildings in a given neighborhood and/or across their portfolios.

Factors and types

One way of thinking about the aggregation of risk would be to explore whether some tactics are more regularly used in the company of other tactics, and whether patterns of tactical combinations can help us to classify landlord strategies into “types” with varying degrees of conformity to type used as a predictor of the severity of the threat.

For example, an owner of multiple buildings might have bought the buildings at a point at which they did not produce a GRM over 11, and perhaps have GRMs at less than that. But this owner might have a significant number of open HPD violations and eviction cases brought against tenants. Another owner might have high GRMs, make repairs, but focus on raising preferential rents. If these patterns were to hold across buildings and owners, we might consider strong examples of the types to be more risky situations than weaker ones.

Of course, it *could* be that building owners’ strategies to displace tenants—to the extent that they do—are selected in a less ordered fashion. Exploratory statistical analysis across buildings should be able to shed light on this question.

Quantifying risk and at-risk residents

An alternative approach, which might be simpler, would note that buildings in which units have been deregulated are ones that *already* demonstrate considerable risk, as do buildings in which many tenants are paying preferential rents, and in which there have been many evictions. These conditions—which could also be extended to owners’ portfolios—are at least relatively *direct* threats. It might, accordingly, make more sense to consider these as higher-level indicators of risk than violations, high GRMs, etc.

What we don't know and why it's important to know it

Who and how many people have already been displaced?

In Inwood and in other neighborhoods facing rezoning, gentrification and displacement pressures already exist and predate the rezoning itself. The announcement of an intent to rezone can help to unleash speculation, but it is equally possible that speculation predates rezoning plans (as seems to be the case currently in Inwood). But all this means is that people have already been displaced. The trouble is that we don't have a clear picture of how many people, from what buildings, and under what circumstances. We know, for example, from justfix.nyc's data, that relative to its whole portfolio, Barberry Rose management was more aggressive in bringing eviction cases against tenants in 10034 and 10040, with an average of 7 more evictions per building. Looked at another way, it brought 1.4 eviction cases per unit per building between 2013 and 2015 in these buildings, as against 0.57 per unit per building across its whole portfolio during the same period. While these are evictions cases rather than marshals' evictions, we can surmise that some portion of these tenants have lost their housing in Barberry Rose-owned buildings. The trouble is that it is exceedingly difficult to know which ones, and which ones left as a result of legal pressure even before a judge signed an order.

Actual rents paid by tenants in particular buildings, whether regulated or preferential rent

Without knowing what the actual rents paid by tenants in particular buildings are, it is impossible to know what the real GRMs are for buildings, and therefore, too, impossible to perfectly accurately look at them as an indicator of landlord strategies. On the other hand, the construction of target rents at specific GRMs goes some way toward indicating where the price-rent ratios for buildings lie.

The other problem with not knowing the actual rents paid is that we neither know whether specific landlords are renting at preferential rents more than others, whether and how they use preferential rents to pressure tenants into accepting substandard conditions, and whether there are tipping points beyond which rents become too expensive for (particularly) low-income tenant households.

Incomes of tenants in most-at-risk buildings

Related to the problem of not knowing the actual rents is not knowing the incomes of the residents in the most-at-risk buildings. Accordingly, it is difficult to be able to tell, for any particular building, whether the tenants are paying a lot more than they can afford or are on the cusp of being asked to do so. And for buildings such as 4861 Broadway, a mixed-use building in the "Commercial U" with a recent history of violations and 14 of its 146 units deregulated between 2007 and 2016, and a \$28 million mortgage from Signature Bank (translating to \$1,452 per month at a GRM of 11), it would be important to know whether tenants made over \$57,000 a year, the point at which it would be affordable at 30 percent of income. It is also nearly \$4,000 more per year than the current neighborhood median income, but about 63 percent of AMI for a four-person household). Otherwise, we should expect that they are in danger of income-based displacement.

Vulnerability of tenants to holdover actions, etc. for lease violations

In neighborhoods like Inwood, where there are many people with limited English proficiency, the risk that tenants are technically in violation of their leases increases. Further, there are tenants who are not on the leases of apartments that have been continuously occupied by their families for many years, even through several generations. These tenants are especially vulnerable to displacement through eviction proceedings.

Relationship of lenders to landlords

There are a handful of lenders (e.g., Signature Bank, New York Community Bank) that have significant market share in multifamily residential loans in the neighborhood, and it is important to gauge whether there are significant links between the banks and landlord behavior. If landlords have aggressive strategies to turnover apartments, putting tenants at risk of displacement, or if sales prices—as in the buildings sold in the last year and a half in 10034 and 10040—are set close to median asking rents, then it is clear that the lenders are helping to drive tenants out. This has been a problem for a long time—the Northwest Bronx Community and Clergy Coalition and the Community Service Society issued a tenant organizing handbook for overleveraged buildings in 1996 based on work that NWBCCC had done beginning in the 1980s—but it's important to understand the dynamics in particular neighborhoods and to see, for example, if some lenders are more predatory than others. Doing so suggests two things: First, it suggests that if there is variation in lender behavior, there is nothing *necessary* about “the market” that drives lenders to give loans that are far out of proportion to existing rent rolls. Second, it suggests that before rezoning and providing new incentives for investment, some regulation of lending with an eye toward preservation is in order.

Assessing Risks of Rezoning

Rezoning presents specific risks that have been addressed largely in the Uptown Unite platform and alternative plan. But they are worth repeating here and expanding in some measure.

The first risk is the *non-replacements of lost units*. If we could get some measure of how much displacement has already occurred—let's say even since the 2013 inflection point—we could get a sense of how many units we might want to see developed in specific income bands to replace ones that have already been lost. We already know, for example, that 453 households have been evicted in 2017 in Inwood. We also know that, based on justfix.nyc's count, for *just the buildings that showed up in ANHD's DAP data*, 1,153 units were taken out of rent stabilization from 2007 through 2016 in zip codes 10034 and 10040. We cannot tell the overlap between these numbers and evictions, nor of other evictions before 2017 or other eviction cases, harassment, conversions from preferential rents or other rent-hikes that have resulted in displacement. But even with this very rough count, we come close to the projected *increase* in “affordable” units projected under rezoning plans (between 1,325 and 1,563).

Related to this is the *inadequacy of the income bands under Mandatory Inclusionary Housing (MIH)* for the neighborhood as a whole. For a four-person household, the 80-percent-of-median rent would be \$1,812 per month. To be sure, this is below the median asking rent in Community District 12 of \$2,050 per month, but it's also nearly \$500 more per month than both the median rent of \$1,330 per month and the rent that is affordable at the median income for the neighborhood \$1,326 per month. The idea that displacement and gentrification could be

addressed by MIH quotas—at almost whatever level—is, in this context, not simply fantastical but hallucinatory.

Of course, rezoning presents the risk of *direct displacement through redevelopment*. Given the current state of the rezoning proposal, it is difficult to assess what these risks would be. In the unamended plan, which also included the Inwood Library redevelopment, the EDC estimated that between 1,325 and 1,563 new affordable units would be built, depending upon the options taken by developers under the MIH rules. But with the possibility that in the Commercial U, some FAR first envisioned for affordable housing might be sacrificed to more commercial space suggests that these numbers are even more out-of-date. They have not, it seems, been revised substantially.

There has been *talk* about several developers working on deals that would provide significant affordable housing as part of the rezoning—above the requirements of MIH. But because these would be negotiated deals that would boost support for the rezoning, they require a significant amount of faith in the follow-through of speculative developers, a faith that could be misplaced if political or economic conditions change, and they certainly provide no real opportunity for public review.

In any case, *only* in the event that all or most of these units conformed to something close to HPD's a deep affordability option, with an average rent affordable at 40 percent AMI would they be affordable to people in the neighborhood, and even have the potential to reach some of Inwood's lower-income residents. The Uptown United plan called for 100 percent affordable development at an average of 48 percent of AMI for a four-person household, the rents would be \$1,087 per month, well below the median of \$1,330 and just over half of the median asking rent. Importantly, according to the Rent Guidelines Board, the average cost of operating an apartment in a post-1946 building with 20-99 units in Upper Manhattan is \$968 per month. For pre-1947 apartments, the median is \$886 per month. Nonspeculative landlords could make this work, but it would also mean that their financiers were more responsible, as well.

The trouble is that even *with* the planned new units, there is a strong potential for *indirect displacement* and a *worsening quality of life for low-income renters who remain in the neighborhood*. The reason is simple: current landlords in the neighborhood understand the “market” to support median asking rents that are more than 50 percent higher than the median rents in the neighborhood. Accordingly, as we have seen, large landlords are setting rents at this higher level, which will mean that upward pressure on rents throughout the zoning area *and beyond* will continue unabated and likely worsen. Any idea that increased supply will lower rents is countered by the already-significant disjuncture between median rents (the rents that prevail in the local market) and asking rents.

The only real questions are whether the expansion of Certificate of No Harassment (CONH) and Right to Counsel (RTC) in Inwood will mitigate the effects of landlords' aggressively trying to turn over their units. There is simply not enough evidence yet on the effects of these programs on landlord strategies to know.

Recommendations

There should be no rush to rezone Inwood. With the City Council and Mayor's charter revision commissions in the process of taking public comment about proposed changes to the City Charter, it would be surprising if suggestions for changing land use procedures is not one of the

foremost concerns of city residents. Specifically, the failure of the CEQR manual to specify that the required EIS take account of rent-stabilized housing is, given what has been presented above, a gaping hole in our ability to predict and understand the dynamics of displacement. That Inwood is still so deeply rent-regulated shines especial light on this problem. Approving a rezoning without a thorough study of displacement dynamics focused especially on landlord behavior seems both premature and frankly, negligent.

And there is a reason that affordable housing advocates and tenants are concerned about rezoning. The recent history of neighborhood rezoning has been one of displacement and rising rents, even with so-called “affordable housing” provided either through MIH or through city programs prior to the current administration. All indicators are that Inwood needs far stronger tenant protections before new development incentives are contemplated for the area. Already, landlords are concentrating portfolios in the area; already asking rents are inflated far above median rents. Already, Community District 12 landlords enjoy the second-highest *increase in* Net Operating Income in Manhattan and the fifth-highest in the city. And already, Northern Manhattan accounts for 80 percent of the cases in Manhattan’s Housing Court.

No rezoning should proceed in Inwood until HPD devises a new term sheet that is geared toward local—Community District-level—income distributions with some adjustor for fair housing. In this way, low- and moderate-income communities of color would not fall victim to gentrification-by-affordable-housing as has been the case in previous rezonings and with significant portions of non-mandatory affordable development under both this and the previous administration. It would also temper the speculative impulse in such neighborhoods while allowing for measured redevelopment with responsible owners. Gentrification-by-affordable-housing does not promote mixed-income neighborhoods, but rather imposes disruptive and damaging churn on the longer-term residents of a neighborhood. As Leo Goldberg[§] has shown, especially in “hybrid” neighborhoods such as Inwood (where the upzoning is targeted and where wholesale changes in land use are not contemplated) these pressures can result in rapid demographic change.

No zoning should proceed without a solid and staffed Partners in Preservation Program already on the ground. This program must take into account the risk factors elaborated in this working paper, and have access to the data that are, at this moment, hard to come by. As the Jerome Avenue Points of Agreement memo from Deputy Mayor Glen indicates, a “Partners in Preservation” program would provide “risk assessment”:

This initiative will seek to identify and prevent the deregulation of affordable homes in CDs 4 and 5. HPD will conduct an analysis of the existing housing stock, including an inventory of all regulated affordable housing to the extent possible using existing data sources and an assessment of the potential for displacement and/or deregulation.**

Any risk assessment that does not focus on landlord behavior, but rather adheres to an older model of displacement risk by landlords who simply cannot keep up with the cost or demands of their buildings and tenants who are priced out by “the market,” will fundamentally miss what is

[§] See Goldberg, “Game of Zones.” Master’s thesis. Massachusetts Institute of Technology Department of Urban and Studies and Planning, 2015. <https://dspace.mit.edu/handle/1721.1/98935>

^{**} See <https://council.nyc.gov/land-use/wp-content/uploads/sites/53/2018/01/Jerome-Avenue-POA-Final.pdf>

happening in Inwood and will be unprepared to deal with the fallout from rezoning. HPD cannot be left to do this risk assessment on its own but must do so with community groups who are already working to help tenants in danger of displacement stay in their homes and ensure that they are safe.

This working paper has sought to spell out some of the “known knowns” and “known unknowns,” to paraphrase former Defense Secretary Donald Rumsfeld’s assessment of the situation in Iraq in 2002. To ignore these—something that Rumsfeld himself should have understood—is to court an irresponsibly optimistic view of what happens next.

**Paul Epstein's July 10, 2018 Spoken Testimony to the City Council on Proposed Inwood Rezoning,
Including the DEIS and Technical Memorandum (with Attachments A & B)**

Contact: paul@RTMteam.net (212) 349-1719 (voice only)

I am Paul Epstein, an **Inwood** resident. I worked for 2 New York mayor's offices and consulted around the world. I know bad analysis when I see it. And the Inwood FEIS is totally unreliable. Thus you do not have adequate data to make a decision so you must reject this application.

The FEIS is unreliable because the development scenario is vastly understated. Thus almost every impact is understated. With such extensive upzoning, projecting only 33 development sites is ridiculous.

In our DEIS comments, we challenged 8 "Development Site Criteria" designed to eliminate as many sites as possible. The City did not respond on the merits to a single one. They just cited the CEQR Manual. This kind of CEQR abuse is being challenged in court. The attorney on those cases was here with us earlier today. *See Attachment A for all 8 criteria with examples.*

Bad criteria and analyses have consequences. I'll cite just one of many cases:

A development criterion we challenged is exclusion of sites with recent construction or renovation.

Thus 1- and 2-story buildings in the "Commercial U" that would be upzoned to 11 to 14 floors were excluded. As a consequence the EIS cited only 26 businesses displaced in the "U." But Borough President Brewer found 147 businesses with 600 to 800 employees in 1- and 2-story soft sites at risk of displacement on the Commercial U. We found 32 more businesses in sites with over 80% FAR increases, for total of 179 businesses at risk. The FEIS is dead wrong.

And, **please do not be fooled by the Technical Memorandum 001's zoning changes** that claim to reinforce small-scale local retail on these streets. ***The actual zoning text*** says otherwise: It ***would permit a wide range of large-scale, non-local uses, including big box chain stores, with no restrictions.*** The original Commercial U is a bad idea that would push out local small businesses. The amendments in Technical Memorandum 001 would accelerate that process. *(See Attachment B.)*

ATTACHMENT A to Paul Epstein's CPC Testimony: Development Scenario Issues in the FEIS

Overly Restrictive Development Criteria that Should be Eliminated or Changed

Source: Pages 10-11 of "Unified Inwood Comments" on Inwood Rezoning Draft Statement of Work (DSOW) with *examples* added here to illustrate most comments. Note that the examples are meant to be illustrative only, and do not represent all possible cases. The City's response to these comments in the Final Statement of Work (FSOW) did not address a single criterion on the merits, but referred to the *CEQR Technical Manual* and professional judgment and past experience of EDC and DCP.

"Underutilized lots" to be included as development sites are "defined as vacant or lots constructed to less than or equal to half of the proposed FAR under the proposed zoning."

- This criterion uses surgical precision to eliminate many likely development sites in Inwood. It eliminates sites with less than 50% FAR available to be built, an arbitrary cutoff. This misses upzoning of *two full zoning increments*, from R7-2 to R8A, even though R8A's FAR is 80% greater than R7-2's.
 - A fully built-out R7-2 lot would be eliminated because it would have 44% added FAR available when upzoned to R8A, even though it could be replaced by a 14-story building with excellent views on half its floors that could command very high market rate rents.
- This criterion also eliminates built-out and mostly built-out R7-2 buildings upzoned one increment to R7D, even though R7D's FAR is 40% greater than R7-2's.
 - R7D lots allow 11 story buildings with good views that could command high rents on upper floors, so it is likely that even some mostly-built out R7-2 sites would be redeveloped in R7D districts if the added square footage is high enough.
 - There are buildings in the "Commercial U" ruled out by this criterion that could get from 10,000 to 115,000 extra square feet of residential development space from their current as-built status.
- The "underutilized lots" definition should be changed to "vacant or lots constructed to less than or equal to 70% of the proposed FAR under the proposed zoning" to capture the R7-2 to R8A increase in full, and to capture most partly built-out buildings that would be rezoned from R7-2 to R7D.
- *Examples: Most of the fully or mostly built-out lots in the "Commercial U." Of all these buildings, some are bound to be redeveloped when the allowable FAR becomes 40% to 80% greater than it is now.*

Exclusion of "sites where construction and/or renovation activity is actively occurring or has recently been completed"

- This makes no sense as a general rule. A recent renovation will not matter if there is a large enough gain in FAR for a developer to increase future profits. For example, a freshly renovated two story building is still getting bulldozed within 15 years if its block is rezoned to 11 stories!
- This criterion should be dropped.
- *Examples: Borough President Brewer described, in her ULURP Recommendation, that there are 147 businesses in one- and two-story buildings in the "Commercial U," yet most of these were not included in the RWCDs as projected development sites. Some examples (of many):*
 - *120-128 Dyckman is a series of 2-story shops not included as even a potential development site though rezoning will allow 11 stories.*
 - *Duane-Reade at 133-141 Dyckman: 1 story building and parking lot, though newly built, would be allowed 11 stories with ground floor commercial space and up to 10 floors of apartments. It is hard to imagine it won't be redeveloped by 2032.*

Exclusion of "sites with institutional uses, active and continuing through the build year, e.g., schools (public and private) and houses of worship, unless there are known development plans."

- Any institution in Inwood may change over 15 years. For example, some churches, because of shrinking congregations or funding, try to sell or redevelop parts of their property. Holy Trinity in Inwood has been discussing redevelopment for a while.
- This criterion should be dropped, or changed to be much more selective.
- *Examples: Holy Trinity is no longer just "discussing" redevelopment. Their Diocese (or its real estate consultant) issued an RFP for developer proposals for part of their land. Also, St. Jude and Manhattan Bible Study Church have developable land cited by Congressman Espaillat as sites for affordable housing.*

Exclusion of "Sites containing government-owned properties, since the development and/or sale of these lots may require additional discretionary actions from the pertinent government agency or the elimination of essential uses that cannot be relocated effectively."

- The criterion has already been broken by the "Inwood NYC Action Plan" the rezoning is based on, which includes redevelopment of the Inwood Public Library on City-owned land. Who is to say other developments on public property will not happen if rezoning enables it? How can the DSOW preparers brazenly use a criterion the City has already broken?
- After we pointed this out in response to the DSOW, the City updated its criterion to start "Except for the Inwood Branch Library," which is an admission of the weakness of this criterion. If the library can be redeveloped, so can other government-owned properties over a 15-year period.
- This criterion should be dropped or made much more selective.
- *Example: Council Member Rodriguez has expressed to residents his vision of developing the lightly-used track behind the library to an immigrant center and affordable housing, with a new track on the roof.*
- *Examples: Borough President Brewer cited, in her ULURP Recommendation, a City-owned DOT lot at Sherman Creek between 205 & 206 Streets (Block 2186, Lot 9), City-owned land in the "Tip of Manhattan" (Block 2197, Lot 75), and a federally-owned site at 5051 Broadway. U.S. Representative Espaillat similarly cited a range of government-owned sites.*

Exclusion of "Sites crucial to the daily operations of utility companies."

- This criterion is too broad and does not account for recent rapid changes in industries that have been considered "utilities." In Inwood, this particularly applies to the Charter Communications site. If that site is rezoned to allow a residential tower up to 26 stories, a developer will offer them plenty and Charter will happily take the money and move.
- This criterion should be dropped, or changed to be much more selective, with at least the Charter Communications site included as a development site as well as one or more of Con Edison's sites.
- *Example: As noted above, Charter Communications site and the site Con Edison had pledged to sell for housing in a Memorandum of Understanding with the City. Congressman Espaillat has included Charter Communications and Con Edison sites in his tour of likely sites for affordable housing.*

Exclusion of "Multi-story, multi-unit residential buildings with existing rent-stabilized tenants (such buildings are unlikely to be redeveloped because of the required relocation of tenants in rent-stabilized units)."

- This criterion may have some basis in rent regulation rules, but it has no basis in reality. Just consider the frequent stories of tenants being bought out or pushed out through harassment. And consider that about 30% of Inwood regulated apartments are leased for preferential rents that can be quickly raised to much higher levels, also forcing people out.

- Borough President Brewer cited that the DEIS “improperly” relied on the *CEQR Technical Manual* to exclude any analysis of potential impact of rezoning on residents living in rent-regulated housing. If rent regulated tenants are at risk, their buildings are candidates for development.
- This criterion should be dropped or made much more selective. For example, City agencies (DOF and HPD) have access to data on numbers of regulated apartments in buildings, changes in those numbers, and numbers of tenants with preferential rents. These data could be used to determine buildings with rent-regulated tenants that pass other screens that are close enough to becoming completely deregulated, or that have few enough tenants to be worth the extra costs to buy out or relocate remaining tenants, to consider these buildings likely to be developed within 15 years. If some of these data (e.g., HPD’s on preferential rents that come from State DHCR) are not public, the Mayor’s Office can ask the other agencies to do parts of this analysis for the EIS. If the City is unwilling to do this extra analysis, then *all* buildings with rent-regulated tenants that pass other screens should be considered projected development sites.
- *Example: Of all 12 community districts with neighborhood rezonings considered or recently passed, CB12 has the highest risk of displacement from rent regulated apartments, according to ANHD’s displacement risk data tool, with 9 rent-stabilized buildings sold to speculators for \$75 million in November 2017 alone.*¹

Exclusion of “Sites generally smaller than 7,500 sf occupied by existing residential development.”

- This criterion is wrong. These sites can be developed easily, especially when spurred by rezoning.
- This criterion should be dropped.
- *Example: 68 Cooper Street, a 5,000 sf undeveloped lot, has been put on the market for \$4 million with the anticipated rezoning featured prominently in the sales material.*²

Exclusion of “Sites with a significant number of commercial and residential tenants.”

- This criterion is wrong. Developers can easily buy out these tenants and will do so with rezoning that offers substantial profits. An important commercial tenant has even told us about a provision in his lease that allows the landlord to terminate the lease if the property owner decided to rebuild. Such a “demolition clause” is not uncommon in commercial leases. That tenant, and others with similar lease provisions, will be easily removed if the rezoning offers profits to developers to build bigger, more lucrative buildings on those sites.
- This criterion should be dropped.
- *Example: C-Town on Broadway just south of W. 207 Street. Unified Inwood comments also asked the City to identify the number of businesses with such “ROFO” clauses and assess the impact of rezoning on them. The City’s response was that this was “outside the scope of CEQR.”*

NOTE: Other “Unified Inwood” Comments on the Inwood Rezoning DSOW also referred to all “soft site” selection criteria generally, including other criteria that seemed arbitrary, and requested studies of comparisons of actual vs. projected development in other rezonings, and for specific reasons why each site was selected or rejected as a development site. The City’s responses in the FSOW were that studies of the reality of other neighborhood rezonings are “outside the scope of CEQR” and that providing the reasons sites were included or selected or rejected was “infeasible.”

¹ Savitch-Lew, Abigail. “Which Neighborhood Facing Rezoning Faces Steepest Displacement Risks?” in CITY LIMITS, Jan. 11, 2018: <https://citylimits.org/2018/01/11/which-neighborhood-facing-rezoning-faces-steepest-displacement-risks/>
 “ANHD” is the Association for Neighborhood and Housing Development.

² Exclusive Offering Memorandum:
<https://www.easternconsolidated.com/media/properties/docs/9cb93f5efcf5f069a25e/68CooperStreetM.pdf>

ATTACHMENT B to Paul Epstein's CPC Testimony: Commercial Upzoning & Related Technical Memorandum

Borough President Brewer eloquently referred to the "Commercial U" (Dyckman St., Broadway, and 207 St.) as Inwood's Main Street with important economic and social uses and meaning for Inwood residents and workers, especially Inwood's many immigrants. Her staff's recent canvassing of the "U" found that 147 businesses—almost half of the businesses in the "U," with 617 to 800 employees, are in 1- to 2-story "soft sites."³ A September canvassing of the Commercial U by a team of CUNY students found a similar result. They also found that the overwhelming majority (80%) of the businesses are independent, family-owned businesses. As Broadway and 207 Street are currently zoned residential with commercial overlays, these are vital, mixed-use corridors. Proposed upzoning will enable higher density in the "U" of 11 to 16 story buildings. Massive redevelopment will ensue, displacing many local businesses and putting about 1,400 existing apartments at risk. We will lose our vital local retail economy that keeps residents' money in Inwood. Instead, chain stores will siphon our spending away to their national headquarters. The Uptown United Platform combines R7A zoning with store front size limitations. That would still enable redevelopment of buildings in these corridors currently below maximum FAR, but would protect and encourage uses by local small businesses. While the current R7-2 zoning and the Uptown United Platform's R7A would still leave current 1- and 2-story sites open to development, the changes would happen much more gradually and "naturally" than with the proposed upzoning, making it more likely Inwood will keep the local, independent character of its "Main Street."

The originally proposed upzoning for the Commercial U would be destructive of Inwood's local economy, and should be rejected. But the further changes to the Commercial U, as well as to Dyckman Street west of Broadway, proposed in "Technical Memorandum 001" would be even worse, for these reasons:

- Changing the zoning designations of Broadway and 207 Street from residential with commercial overlays to fully commercial will allow a much wider range of commercial uses than now allowed on those streets, inconsistent with the neighborhood "Main Street" local small business character of those corridors.
- The Technical Memorandum describes storefront restrictions on 207 St. and Dyckman east of Broadway to preserve small businesses, but the actual zoning text amendment⁴ for this provision renders these protections meaningless by not restricting many non-local uses, enabling a wide range of "big-box" chain stores and other non-local uses, including large bars and nightclubs, in the whole "Commercial U" and other sub-districts, including, e.g.:
 - *Use Group 10* consists primarily of large retail establishments (such as department stores) that: (1) serve a wide area, ranging from a community to the whole metropolitan area, and are, therefore, appropriate in secondary, major or central shopping areas; and (2) are not appropriate in local shopping or local service areas because of the generation of considerable pedestrian, automobile or truck traffic.⁵
 - *Use Group 12* is also explicitly non-local, including non-local venues expected to bring in outside traffic such as large-scale bars and restaurants with entertainment and dancing.³⁷
- *We asked EDC if our interpretation of the zoning text is correct. They confirmed we are correct.*⁶
- And these very weak restrictions do not even apply to Broadway or Dyckman west of Broadway.⁷

³ Brewer, Gale. "Borough President Recommendation" on Inwood Rezoning ULURP Application, April 26, 2018, pp. 23-24.

⁴ Technical Memorandum 001 for Inwood Rezoning Proposal, Appendix A, Zoning Text 142-14 and Map 2.

⁵ Zoning Resolution of the City of New York:

<https://www1.nyc.gov/assets/planning/download/pdf/zoning/zoning-text/art03c02.pdf>

⁶ E-mail of Adam Meagher of EDC to Paul Epstein of May 7, 2018, in reply to Epstein's May 2, 2018 e-mail. We will provide this upon request.

⁷ Technical Memorandum 001 for Inwood Rezoning Proposal, Appendix A, Zoning Text 142-14 and Map 2.

- Enabling commercial buildings in the “U” and other sub-districts to have higher ceilings for the same FAR on commercial sites is another invitation for large big box chain retailers to come to Inwood and displace local small businesses, as most small businesses do not need the extra height but most big box chains do.
- The mechanism used to allow commercial buildings added height is to provide the MIH contextual height bonus to development of fully-commercial buildings with no housing. This would seem to subvert MIH which was created as a mechanism to ensure developers produce affordable housing.⁸

Alternative Zoning and Policies for the Commercial U and Other Inwood Commercial Subdistricts

Consistent with the Uptown United Platform, zoning on Broadway and 207 St. should be contextual mixed-use (R7A) with a commercial overlay and Dyckman east of Broadway should be C2-6A⁹ with a Special Enhanced Commercial district similar to the Upper West Side. Formula store conditional use authorizations should be included as in San Francisco, intended to keep costs affordable for local independent retailers.¹⁰ Inwood should be seen as a prime candidate for at least a pilot implementation of the San Francisco model because of the still existing vibrant small business and entrepreneurial culture uptown.

The CB12 Resolution and Manhattan Borough President Recommendation on the Inwood Rezoning Proposal proposed smart small business-friendly policies, many of which are consistent with the City Council’s “Planning for Retail Diversity” report¹¹ and the Uptown United Platform¹², including:

- Restrict store sizes (CB12: to 3,000 square feet, except supermarkets) and store frontages to create space for small businesses, as in the Upper West Side Enhanced Commercial District.
- Require a "Conditional Use Application" that requires a DCP public hearing for any chain store (formula retail use) that seeks to open in a rezoned area;
- Enact anti-harassment policies and penalties to protect small business owners;
- Allocate a percentage of all new retail space in buildings developed on city-owned land or with city subsidies or other financing to current small business lease holders who are displaced due to landlords exercising demolition and new construction lease clauses;
- Give priority to small business enterprises for new ground-floor retail space created in new residential and commercial developments;
- Hold real estate taxes for properties within the rezoning area at current levels for three to five years after enacting the Proposed Actions to allow commercial landlords and tenants time to assess the impacts of the rezoning;
- Aggressively deploy SBS programs and services to local small business owners to make them aware of available programs and services and to facilitate businesses accessing these programs and services.

In addition to the above, the zoning text should:

Restrict Supermarket sizes to 15,000 square feet to sustain a varied offering of products that responds to the socioeconomic demographic diversity in the neighborhood.

⁸ Technical Memorandum 001 for Inwood Rezoning Proposal, p. 4 and Appendix A, Zoning Text 142-49 and Map 1.

⁹ “Uptown United Platform,” 2018, pp. 5-6.

¹⁰ San Francisco Planning Department, *San Francisco Formula Retail Economic Analysis*, 2014, http://www.sf-planning.org/ftp/files/legislative_changes/form_retail/Final_Formula_Retail_Report_06-06-14.pdf/

¹¹ The New York City Council, “Planning for Retail Diversity,” 2017.

¹² “Uptown United Platform,” 2018, pp.10-12.

JULY 10, 2018 PUBLIC HEARING TESTIMONY OF NANCY PRESTON

New York City Council Subcommittee on Zoning & Franchises INWOOD REZONING LU 0138-2018, 0139- 2018, and 0140- 2018

I am Nancy Preston, 17 year Inwood resident, community activist.

This deeply flawed top-down plan ignores the input of community residents and small businesses. Why else would the EDC amendments allow big-box stores, large nightclubs, hotels, and change the Commercial U to permit MIH height bonuses with no housing?

It will result in displacement of residents and businesses-
9200 people with preferential leases
61% rental units that are regulated
94% small businesses that hold leases

Property owners will see their parcels appreciate exponentially, incentivizing tear downs and flipping.

This aggressive plan asks Inwood to absorb a 40% population increase of 14,000. The **Uptown United Platform** estimates the rezoning enables development for 46,000!

Remember in the 2001 Queens Plaza rezoning 300 new residential units were estimated but 10,000 new units were built.

Inwood has absorbed more than its fair share. We have been dumped on, dismissed and disinvested in for decades.

Now is the time to give back that land that has housed city trucks, buses, utilities and rails.

100% permanent real affordable housing, contextual to Inwood can be created by a Community Land Trust (CLT) and developed by non-profits. The land should not be given away and subsidized to entities that will eventually turn it over to market rate for profit.

NYC should be a leader in the CLT movement.

Full Disclosure I am a founding member of the Northern Manhattan Community Land Trust (NMCLT).

There is great opportunity here to produce an ethical & practical long term plan that will benefit the people.

This is all put forth in the **Uptown Untied Platform**.

Rezoning must serve all the people.

What is the role of our government but to be visionary, and to be humane?

Especially now.

Please say NO to the EDC plan and YES to the Uptown United Platform.

Nancy Preston
17 Seaman Ave.
New York, NY 10034
nepreston1@gmail.com 917-596-0447



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MAS Comments for New York City Council on the Inwood Rezoning Proposal, CEQR No. 17DME007M, Manhattan, NY

July 10, 2018

The Municipal Art Society of New York (MAS) believes the Inwood rezoning proposal comes at a vital juncture for the neighborhood. While the time is ripe for a comprehensive rezoning to frame Inwood’s future, growth must be balanced with equitable protections for the community and the many elements that make it such a special place. Adequate and appropriate safeguards must be put in place through the rezoning that protect Inwood’s community character.

Inwood is truly a unique neighborhood. It sits at the northern tip of Manhattan, characterized by its hilly topography, bountiful parks, historic resources, relationship to the water, and diverse population. It is this long-standing population—the residents and businesses—that must be protected for the rezoning to be successful.

MAS is encouraged by the *Inwood NYC Action Plan* that frames the rezoning proposal, in particular its plans for the Inwood Affordable Housing and Library site, the level of outreach to local residents to support tenants’ rights, investments in infrastructure, and support of neighborhood businesses through grant programs.

However, we remain concerned about the potential for low-income residents to be displaced, the gentrification of retail establishments, and the potential long-term effects future development will have on cultural and natural resources.

Background

The rezoning affects a 59-block, 230-acre area. By the 2032 build year, the rezoning would result in an incremental increase of 4,397 dwelling units, including 1,379 or 1,618 affordable units, depending on which Mandatory Inclusionary Housing (MIH) option is selected, and 12,224 new residents to the area. With the rezoning, Inwood’s population would increase by nearly 30 percent in less than 15 years.

In terms of land use, the proposal would add 1.2 million square feet (sf) of commercial space, the most of any City-led rezoning, almost a half-million- sf of community facility space, and a 50,000 sf decrease in light industrial space.

MAS Recommendations and Comments

Reasonable Worst Case Development Scenario (RWCDS)

As is the case with other City-led rezoning proposals, MAS finds the Reasonable Worst Case Development Scenario (RWCDS) that frames the analysis in the Final Environmental Impact Statement (FEIS) does not accurately represent the most conservative development projection under the zoning proposal because it does not take into account rent-stabilized and underbuilt residential buildings.

This is an important distinction in the evaluation of socioeconomic conditions in Inwood where approximately 70 to 80 percent of housing units are rent-stabilized or rent-regulated. Therefore, the RWCDS should include applicable rent-stabilized and underbuilt units in the rezoning project area.

We have also found that the FEIS does not include a description of the proposed development at sites 2A and 2B, part of the Columbia Presbyterian Hospital expansion in the “Tip of Manhattan Subdistrict.” The expansion is expected to

result in a half-million sf of new development, including a quarter-million sf of medical office space and nearly a quarter-million sf of research office space.

Given the size of the proposed development, MAS finds the lack of details on the development sites to be a glaring deficiency in the FEIS evaluation. The development of market-rate buildings may increase the demand to redevelop multifamily dwellings outside the soft sites. Our concern is that by increasing density near a large number of buildings with rent-stabilized units, additional redevelopment pressure could be put on nearby properties, which in turn could lead to potential indirect displacement of low-income residents. These concerns are magnified by the fact that a quarter of Inwood's households live below the poverty line.

Furthermore, there may be additional challenges for the many nearby properties with rent stabilized units. Our research shows there are 316 buildings with rent-stabilized units in the project area registered with the DHCR, and an additional 15 are likely to have rent-stabilized units that are not registered.¹ Although the owners might not have the incentive to demolish and redevelop many of these buildings because they are not considered underbuilt, they may be inclined to deregulate stabilized units or worse, illegally convert them into market-rate. In fact, many of these residents are at risk of facing tremendous increases in rent because approximately 30 percent of rent-stabilized units in Inwood currently have preferential rents.²

Because the FEIS does not evaluate the potential impacts of illegal conversions of rent-stabilized units or the increase of preferential rents, the full impact of the rezoning is not known.

Public Policy

Waterfront Access Plan and Waterfront Revitalization Plan Assessment

The rezoning area adjacent to the Harlem River is within the 100-year floodplain. Although the FEIS identifies a transfer of development rights program and construction standards for resiliency and flood mitigation, MAS recommends additional and more stringent measures. We urge the City to further reduce or restrict development in flood prone areas and encourage stronger flood mitigation infrastructure not only to reduce loss of life and destruction of property, but also to minimize the impact of local Combined Sewage Overflow (CSO) events in the Harlem River.

In 2016 alone, 38 CSO events occurred at one outfall in Inwood, accounting for 18 million gallons of raw sewage and stormwater runoff pouring directly into the Harlem River. According to the FEIS, the 33 projected development sites would generate 1.4 million additional gallons of sewage, a 567 percent increase over No-Action conditions.

The FEIS mentions that a new drainage plan is being developed for the area that would address future capacity requirements. However, the Water and Sewer Infrastructure evaluation concludes that no adverse impacts to wastewater would occur as a result of the rezoning.

Given the existing high levels of water contamination in the Harlem River, we find this conclusion to be premature. The failure to create and disclose the findings and recommendations of a drainage plan and how it would be implemented in the rezoning area to minimize future impacts renders the analysis incomplete.

¹Henrick, Chris, 2014, *Am I Rent Stabilized?* Graduate Thesis Studio, Parsons MFA Design & Tech, http://chenrick.carto.com/tables/all_nyc_likely_rent_stabl_merged/public (last accessed February 13, 2018)

²<https://projects.publica.org/graphics/preferential-rents>

Socioeconomic Conditions

Indirect Residential Displacement

With more than 12,000 new residents anticipated, the rezoning could drastically change the socioeconomic conditions of the Inwood community. Therefore, for a proposal that touts affordable housing as a primary objective, we find the FEIS analysis incomplete because it does not identify or evaluate an MIH income band. This omission, including a lack of details on unit size and number of bedrooms anticipated for the affordable dwelling units, raises questions about the completeness of the FEIS with respect to housing affordability.

It is critical that the Inwood community is informed of the number of affordable units that would be created in the rezoning area and the level of affordability offered. This is particularly important in light of the Broadway-Sherman Avenue Rezoning in 2016, which was eventually rejected by the City Council based on questions about the project's level of affordability. Without this disclosure, the community does not have sufficient information to assess this critical component of the rezoning.

According to U.S. Census (2011/2015 American Community Survey data) 29 percent of the households in Community District 12 have an income that is less than 30 percent of the Area Median Income (AMI), \$24,500 for a three-person household. The deepest affordability option under MIH would require that 20 percent of the residential floor area be affordable to households earning 40 percent of AMI (\$32,640 for a three-person household).

Another option under MIH provides dwelling units affordable at 60 percent of AMI (\$49,000 for a three-person household) which is above the neighborhood's median household income of \$41,700.

Based on these options, MAS recommends that the deepest level of affordability be evaluated to ensure that affordable housing is within reach for the greatest number of existing residents. We also recommend that the City explore deeper levels of affordability and include them in the Alternatives Analysis in the FEIS.

It is refreshing to see the City's commitment to local affordability through the Inwood Affordable Housing and Library Development Project to create a 100 percent affordable development of 175 units. In particular, new affordable units at the library site will be affordable to households earning between \$20,000 and \$40,000 per year serving a key demographic of extremely low-income households that most need affordable units.

Direct Business Displacement

The project is expected to directly displace more than 300 employees in local businesses. No mitigation measures have been identified to offset the impact, especially the Super Associated Marketplace and Compare Foods grocery stores that been identified as potential development sites. While it is possible that new grocery stores will be constructed under the proposed rezoning, it is imperative that practical and affordable grocery shopping options are available for residents. Therefore, we expect the rezoning to be revised to include protections so that certain areas do not become food deserts.

The FEIS states that approximately 31 businesses would be directly displaced by new development under the rezoning. MAS believes there should be mitigation measures to facilitate the relocation of these businesses such as relocation assistance and grants from the Department of Small Business Services.

Indirect Business Displacement

Most of the proposed and potential development sites in the rezoning area have commercial uses and will be rezoned to mixed-use districts. The addition of a large influx of residents with incomes well above the neighborhood average raises substantial concerns of retail gentrification. These residents are likely to demand goods and services from retailers that are not currently available in the neighborhood. MAS is concerned that local businesses will be pushed out of the neighborhood.

The FEIS states that the rezoning may lead to increases in area retail rents due to higher demand brought by new residents. However, the analysis obscures the possibility that new residents' tastes will differ from those currently living in Inwood. While Inwood is a hub of Dominican culture today, with shops and restaurants catering to the local Dominican population, incoming residents are unlikely to demand the same retail opportunities. MAS feels that it is inappropriate not to address these factors in the FEIS. The City must devise a plan including protection measures to prevent, to the extent practicable, indirect business displacement.

Community Facilities

Significant questions remain about how the rezoning would affect school capacity in the area and the analysis of school capacity in the FEIS. With an enrollment of 7,779, elementary schools in Community School District 6 were at 101 percent capacity last year. However, according to the FEIS No-Action development scenario, enrollment will decrease to 6,209 by 2032, a drop-off of over 1,500 students in the next 14 years. We find the FEIS and subsequent responses lacking in explaining the marked drop-off and how it translates to the number of elementary school students anticipated in 2032.

While MAS supports the development of the New York Public Library site, and we are appreciative that the City has planned for a larger library space, the FEIS fails to provide specific information on the expected timeline for library construction and the specific location of the temporary library. These key omissions could have significant impacts on the local community and we ask the City to disclose this information.

Shadows

The evaluation of shadow impacts on the Harlem River is inadequate. According to the FEIS, development under the proposed rezoning would result in five to six hours of incremental shadows on the Harlem River throughout the year. The Harlem River is both an essential fish habitat and an impaired river, due to the presence of pollutants, according to the EPA. MAS appreciates the inclusion of additional analysis in the FEIS regarding the impact of shadows on fish species in the Harlem River. However, MAS urges the City to explore design changes for future development that would reduce shadow impacts in the Harlem River.

Historic and Cultural Resources

The Dyckman Farmhouse, which is both a National Historic and individual New York City landmark, is at Broadway and West 204th Street, directly within the Commercial "U" sub-district for which an upzoning is proposed. The Dyckman Farmhouse must be protected from the impacts of construction from nearby developments.

Archaeology

The Inwood area has a potential trove of archaeological resources. According to a Phase 1A Archaeological Assessment, conducted as part of the FEIS and reviewed by the Landmarks Preservation Commission (LPC), eleven projected development sites and six potential development sites may contain archaeological artifacts. LPC recommended that archaeological testing be done before any development can occur on these sites. While City-owned development properties, including site 25, will conduct archaeological studies prior to excavation and construction, the FEIS states that no measures are in place to require archaeological testing for private developers apart from the reporting of any human remains, should they be unearthed.

MAS finds the lack of protection for potential archeological resources disconcerting. Given the likelihood of these assets, we urge the City to require that all archaeological remains found in the Inwood area be documented and that the proper authorities, including the LPC, be notified.

Alternatives Evaluation

The FEIS evaluates three alternatives: No-Action, Proposed Action, and a Lower Density Alternative. To provide a wide range of potential development options, MAS is disappointed that the FEIS does not evaluate an alternative in which the rezoning only takes place east of 10th Avenue and the impacts are primarily constrained to business displacement in the



Sherman Creek area. This alternative scenario restricting development to the east of 10th Avenue would have allowed new development while maintaining the building scale and character of the heart of the neighborhood.

Conclusion

MAS recognizes how critical the rezoning proposal is for the future of the Inwood. With the influx of such a large number of new residents and the expected development the rezoning will facilitate, Inwood is surely set to change.

In light of the imminent changes, the City must do all it can to ensure that new growth is carefully integrated equitably and protects all the elements that make Inwood a special place. Particularly its people.

We find that a rezoning in Inwood is prudent given the changes that the neighborhood has seen in recent years. However, our concerns need to be addressed in the current proposal before we can support it. We urge the City to incorporate our recommendations into the proposal.

Thank you for the opportunity to provide comments on this critical rezoning.

FOR THE RECORD

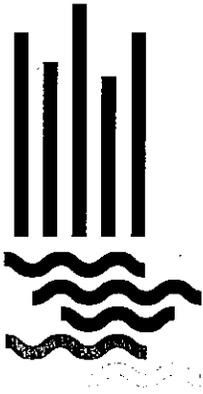
FOR THE RECORD

Public Testimony New York City Council, Subcommittee on Zoning and Franchises

Re: Special Inwood District Rezoning [C 180204(A) ZMM, N 180205 (A) ZRM, N 180206 PPM, N 180207 PQM, N 180208 HAM, C 180073 ZMM]

July 10, 2018

Roland Lewis
President and CEO
Waterfront Alliance



The Waterfront Alliance is a non-profit civic organization and coalition of more than 1,000 community and recreational groups, educational institutions, businesses, and other stakeholders committed to restoring and revitalizing New York Harbor and the surrounding waterways. New York City is a city of water, with our waterways serving as a vital resource for commerce, transportation, education, and recreation.

The Special Inwood Rezoning District is an opportunity to greatly expand access to northern Manhattan's waterfront, which currently provides a broad range of on-water programming, but has not yet met its full potential. More and more New Yorkers are interested in getting not only to the water's edge, but onto and into the water: from paddling and sailing, to fishing and oyster monitoring. This sea change is taking place all across our city, and northern Manhattan is no exception. Manhattan Community District 12 is home to community paddling programs at Inwood Canoe Club, community sailing programs by Hudson River Community Sailing at La Marina, a public boat launch at Muscota Marsh, and rowing programs by Row New York at Swindler Cove on the Harlem River, just to name a few.

Waterfront Alliance recognizes there are still too few neighborhoods with access to the full scope of educational, cultural, and environmental resources our 520 miles of coastline can offer. While wealthier neighborhoods can afford to cross-subsidize their waterfront parks with luxury development, this is not the case across most of our city. In recent memory, a kayak dock in Harlem sank into the Hudson River, and Cromwell Recreational Pier in Tompkinsville, Staten Island, and the East River edge of Rainey Park near Ravenswood Houses in western Queens have both collapsed into the water, leaving residents of those communities with holes on their waterfronts. While we take no position on questions around density, bulk, or other matters related to upland development, and respect the community's concerns and those of local elected officials, we do recognize that the proposed plan provides a significant opportunity to reconnect residents of northern Manhattan with their waterways through several different channels.

We support the proposed Waterfront Access Plans to create new public open space along the waterfront, and encourage the City, the private sector, and community stakeholders to ensure that any planned projects on the waterfront incorporate direct access to the water for recreation, education, or transportation uses. Last year we launched a new initiative, the Harbor Scorecard, a district-by-district dashboard for strong, healthy, and open waterways, measuring coastal flood risk, water quality, and public access to the water. Counting recreational boat launches, historic boat programming, ferry landings, tour and charter locations, and marinas, there is just one place to board or launch a boat for every four miles of our city's coastline. We can do better to ensure that all New Yorkers

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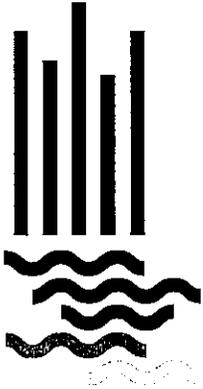
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President and CEO

have equitable access to the waters that surround us. Many new waterfront spaces have been built or retrofitted with upland uses in mind, restricting access into and onto the water. We know this neighborhood can be better served, and strongly support Council Member Rodriguez' long-standing efforts to expand ferry transit to this district, to provide additional transportation choice for northern Manhattan, as well as his advocacy for an Eco Dock facility to provide on-water educational programming.



Working with more than 100 practitioners and community partners, Waterfront Alliance has developed a program to produce better outcomes at the water's edge. Our Waterfront Edge Design Guidelines rating system, or WEDG, provides guidance and certification for excellent waterfront projects that improve resilience, ecological outcomes, and public access to the water, beyond what is required by law. Freely available as a public resource, it can serve as a template for all parties to achieve exemplary, multi-functional waterfront design that best serves community needs: encouraging ecological enhancements such as wetlands restoration, measures to plan for sea level rise, and providing accessible infrastructure for use of our waterways. Last year, the WEDG program engaged in community collaborations, from Soundview and Hunts Point, Bronx; to Newtown Creek and Flushing, Queens, building from community-based planning efforts and priorities to provide concrete recommendations for waterfront projects. We hope that these processes can provide a successful reference point for collaboration toward resilient, healthy, and accessible waterways in northern Manhattan.

We thank you for the opportunity to present this testimony, and welcome any questions you may have.

My name is Karla Fisk, with the Inwood Small Business Coalition, reading the testimony of Dr. Jennifer Tsung.

My name is Dr. Jennifer Tsung. I am a veterinary doctor and the owner of the Inwood Animal Clinic.

I wasn't able to testify in person today because I have patients I had to see. Small business owners are always working non-stop to keep their businesses running.

I opened Inwood Animal Clinic 10 years ago. Inwood never had a veterinarian and really needed one. When I started, I knew that Inwood is not a high income neighborhood. We work hard to do the best for our community pets for a reasonable price. The majority of our employees all live in the neighborhood.

The existence of the Inwood Animal Clinic and all of Inwood's small businesses is threatened by this rezoning. Property taxes are paid by small businesses, not their landlords. With rezoning, there would be a jump in property values and that would mean a jump in property taxes as well as rents for business owners. One of my business neighbors just had his property taxes jump by 35%!!

My business is under specific threat from the rezoning proposal because my building is located in a "soft site", a low building that would be rezoned to allow buildings to be built up to 11 stories high. This would give my landlord a strong financial incentive to not renew my lease.

You can see from the map I distributed, that all the commercial & industrial areas of Inwood would be dramatically rezoned from the present maximum height of seven stories to up to as high as 30 stories.

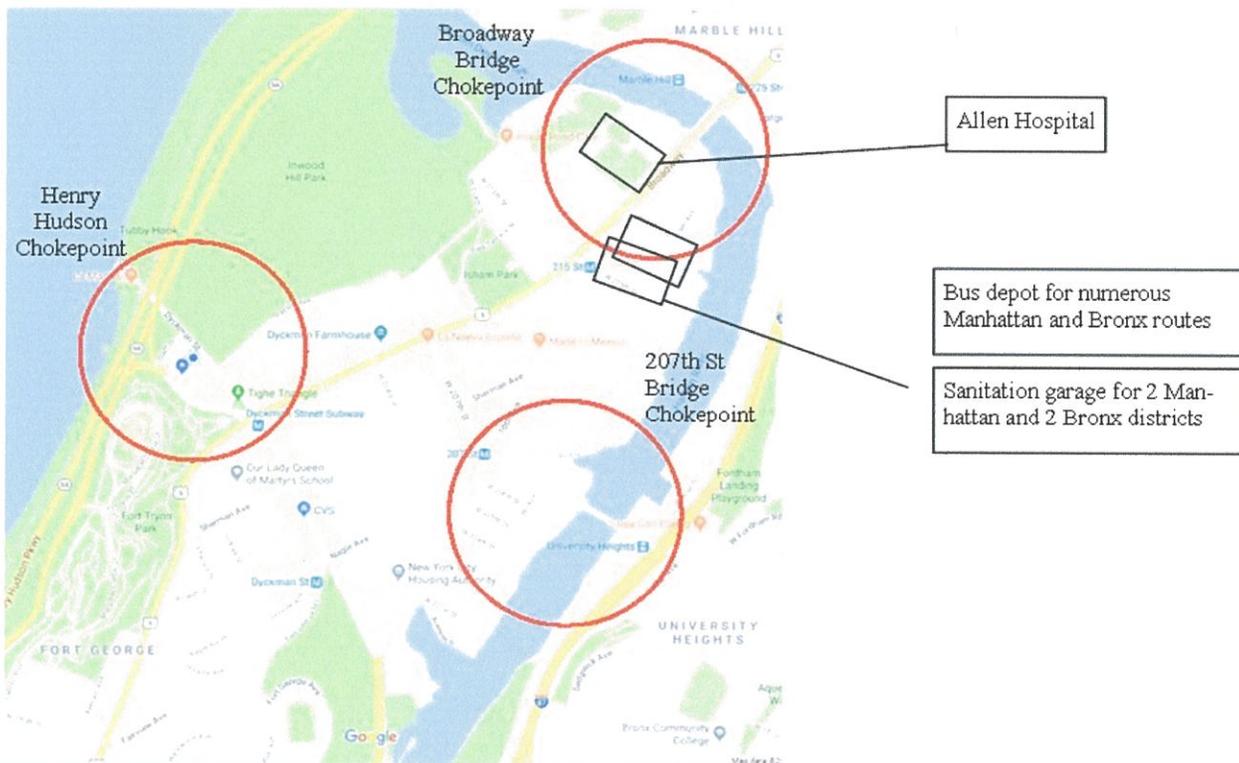
This rezoning proposal would hurt or remove almost every independent small business in Inwood. Please, vote NO on the Inwood NYC Rezoning Proposal.

Oral Testimony for Inwood Preservation to City Council Zoning subcommittee

By Maggie Clarke, Ph.D., July 10, 2018

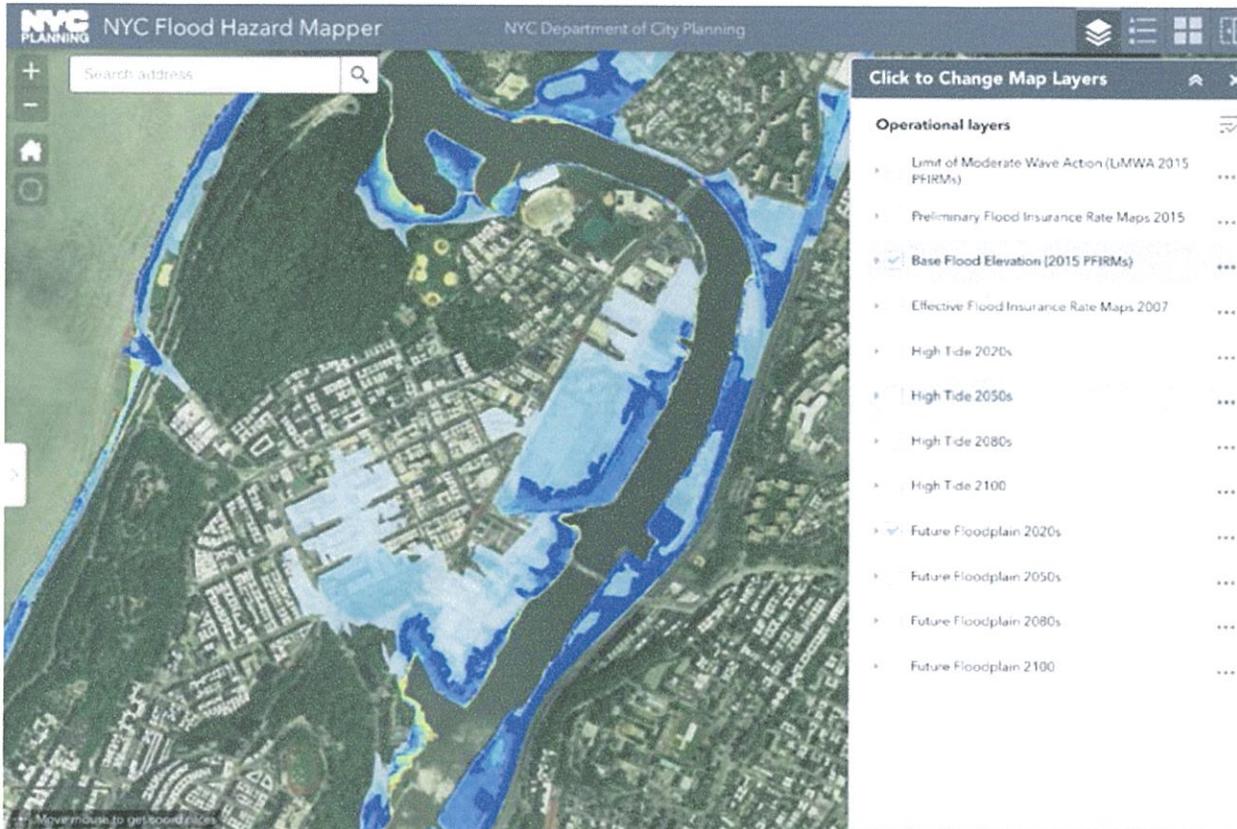
maggie@maggieclarke.com

- Adding 14,000 people to Inwood will have major environmental consequences because it is almost surrounded by water and park, and most streets have one traffic lane, so one double-parked car causes backups.
- There are 3 main ways in and out of Inwood. We call them chokepoints as they are easily gridlocked.



- The City's Environmental Impact statement admits that 45 intersections will go to mostly F Level Of Service. The E Level of Service means operating at full capacity. F means the road is in constant traffic jam.
- Intersection Delays will increase everywhere in Inwood up to 10 minutes.
- The EIS understates impacts because they didn't study after 4:30 pm.
- Unified Inwood had requested numerous studies to include peak times and locations.
 - EDC refused to do these studies.
- When Inwood is in gridlock, this will spread to Washington Heights and the Bronx.
- More people will attempt to ride the subways. But 8,000 more trips are already forecast and those delays will spread up and down the lines.

- Some of the worst delays were near Allen hospital where 27 story buildings are proposed. Ambulance, fire and police delays will cost lives.
- Inwood's water, sewer, gas and electric lines are about 100 years old. They can't absorb major population increases and will fail more often.
- A third of Inwood is in the 100 year flood zone. The NYC Panel on Climate Change predicts Inwood will flood more severely and more frequently in coming decades.
- Many 17-30 story buildings are proposed for this flood zone.



- These are just two of the many environmental and social impacts that make the City's plan for Inwood so deficient that no one, in good conscience, should be able to support it. It will be disastrous.
- Please reject this plan and ask the City to create a more modest plan, such as the Uptown United Platform.



FOR THE RECORD

NYRP Testimony

New York City Council Zoning Subcommittee Hearing - Inwood Rezoning | July 10, 2018

New York Restoration Project (NYRP) has been active in Inwood since 1995. Our first origins were mobilizing volunteer clean ups at Fort Tryon Park, then Fort Washington Park, and later Highbridge and Sherman Creek Parks. These conservation efforts were all rooted in the conviction that every New Yorker deserves access to high quality green space and NYRP remains committed to that belief, as is exemplified by the work we do to promote social capital, sustainability, and resilience in our community.

Since the beginning of the InwoodNYC Plan, NYRP has contributed input and recommendations in order to advocate for a more accessible, active, and resilient waterfront. We participated in the earliest visioning sessions, sat on the Inwood NYC steering committee throughout 2016, and attended many public visioning sessions, town halls, and hearings since. Regardless of whatever outcome is reached through this process, we feel strongly that the following priorities should be included in any future land use discussion in this vital community.

Waterfront Access

Despite being surrounded by three waterways, many barriers prevent Inwood residents from enjoying the full range of benefits of our waterfronts. We believe strongly that any future land use decisions impacting waterfront development should prioritize public access, shoreline resilience, and support a range of community-led programs. We support the development of a Waterfront Action Plan which will create a framework for public waterfront open space along the Harlem River waterfront. (ES-7)

The street end waterfront plazas on 202nd, 203rd, 204th and 205th Streets are underutilized at present due to a lack of connectivity, wayfinding, and programming. We have long voiced a vision for a continuous, public waterfront from Sherman Creek Inlet to the North Cove. The waterfront land parcels sited between each of these plazas must be opened up for public use and designed as one cohesive network.

We recognize NYCEDC's attempt to achieve this by re-parceling city land along the Harlem River in order to trigger public access mandates (required for sites with at least 100 feet of shoreline) (ES-16). We urge the City to additionally incorporate unified design guidelines, including the Waterfront Alliance's WEDG criteria. These would promote a connected green network based on a cohesive design strategy, not left to the discretion of different developers over time.

We also encourage the city to enforce access protections at any new developments that take place on the waterfront. Any attempts to refuse public access or control access to any waterfront sites within a designated property must be prohibited.

Academy Street

NYRP supports NYCEDC's proposal to demap parts of Academy Street near Tenth Avenue to facilitate the creation of future public open space along the Harlem River (ES-29). This site has long been inaccessible to the public and offers significant opportunity for waterfront programming and other community uses. NYRP urges the City to ensure that any future public realm decisions for Academy Street are consistent



with design and management quality of the adjacent Sherman Creek Park. NYRP stands ready to partner with the City to facilitate any future community design process for the activation and transformation of this important footprint.

Sustainability

Inwood's parks support biodiversity on the neighborhood's outer edges. These networks should be strengthened by investments in green infrastructure (street trees, bioswales, and rain gardens) extending from the outer parks into the neighborhood core. Such interventions are critical in supporting a vibrant public realm, reducing and filtering storm water runoff, relieving the overburdened sewer system, and supporting biodiversity. NYC Parks, NYCDOT, and NYCDEP should integrate a collaborative strategy for green infrastructure that spans across parkland, waterfronts, NYCHA campuses, and streetways. NYRP stands ready to partner in this endeavor.

Inwood is a citywide model for environmental education. NYRP alone reaches over 10,000 students grades K-8 through environmental programs, which engage young people directly with six natural ecologies found in Highbridge and Sherman Creek Parks. The City should continue adding resources so that such programs can grow. The Harlem River is also a great marine education resource, used by NYRP and many other community based organizations for STEM education and recreational programs. Future investments in Inwood should center on STEM education programming, supporting existing initiatives and helping build the capacity of the neighborhood's academic institutions.

Resilience

Much of the Inwood rezoning area's waterfront sits within the 100-year floodplain and is vulnerable to sea level rise and storm surges. This footprint is also an important geography for marine life and waterfront recreation. Waterfront open space should integrate living shoreline design techniques. These strategies mitigate major storm impacts, trap carbon, improve water quality, prevent shoreline erosion, enhance biodiversity, and support marine habitats.

FOR THE RECORD

Testimony for Inwood, July 10, 2018
Lynn Ellsworth, Human-scale NYC
lynnellsworth@outlook.com

I don't live in Inwood, but I have walked every block of it, many times, since 1980. And still I am as amazed as I was the first time I encountered it.

It is one of the greatest neighborhoods of not just New York City, but the country. I say that because it has a very rare thing for the United States: a just right, livable, Goldilocks-level of urbanity – meaning not too tall and not too low, with enough population density to support thriving small businesses and a vibrant public life, on streets that actually have trees and sunshine. Off the grid, surrounded by parks, Inwood is densely built out with handsome brick 6-story pre-war buildings that sit on short blocks that curve, rise, and fall with Northern Manhattan's unique topography. The apartments are mostly smaller and rent-stabilized, and occupied by working Latino families. And since it was built out in the same era, Inwood has unusual visual integrity. Planners should be copying Inwood, not harming it.

The kind of urbanity everyone wants for New York is *already* there. It has bustling Mom and Pop stores, housed in both mixed-use and commercial buildings. People of many colors and incomes live there. There are very few empty storefronts. Gentrification exists but not at the Defcon 1 level of threat one sees in Sunset Park. There are old Churches with thriving congregations, and well-maintained schools, and a just-right, recently renovated public library that the city is crazy to want to demolish. The sidewalks are filled with children riding bikes and clusters of families talking. People bring folding chairs and tables to play dominoes under the trees. Kids carry inflatable kiddie pools from one block to the next and fill them with water from hydrants. People chat from lower floor windows to people on the street. It is, to be honest, the kind of urban ideal that Jane Jacobs wrote about and that City Planners can only dream of creating in this day and age.

Clearly, Inwood is not a problem that needs fixing. Maybe it needs a public swimming pool. And yes, it would be nice if the two-story commercial buildings were 6-stories high like the rest of the neighborhood. But how would you do that without cruelly evicting the thriving businesses already in them? The best idea is to leave that false "problem" alone: it will fix itself over time. And true, there are a few parking lots on the commercial streets that ought to be filled in - but just to 6-stories like the rest of the neighborhood. And then planners point to the low-rise, manufacturing area between the elevated tracks on Tenth Avenue and the Harlem River. It is not empty, just low. It leads down to well-used pocket parklets along the undeveloped waterfront. Developers look at that area and see dollar signs: hey, let's rezone this for luxury high rise housing! But why should we do what they want? Jane Jacobs suggested a different approach to a similar situation in Toronto. There she argued for small plans over big plans. Her idea: extend the existing zoning and street grid from the successful part of a Toronto neighborhood through a former manufacturing area to the waterfront. They did just that, and it worked beautifully.

But DCP's plan attacks the great urbanity of Inwood by over-packing the commercial corridors with 11 and 14 story buildings that guarantee the eviction of the existing Mom and Pops. It aggressively over-densifies and seeks to destroy the just right density that is already there. It will physically split and wall off the neighborhood into four separate areas rather than keep it united and intact. It would massively overdevelop the area going down to the water with high-rise luxury glass towers, effectively privatizing the waterfront for the wealthy and putting gentrification on steroids. Displacement of the existing residents would be inevitable.

It does not have to be that way. The residents of Inwood came up with an alternative plan that builds affordable housing without gentrifying, that keeps Inwood's scale and visual integrity intact, and that, in a more thoughtful way, knits the manufacturing stretch back into the old neighborhood, just in the way Jane Jacobs suggested. It is a plan that avoids massive displacement of small business and residents. We at Humanscale NYC urge Ydanis Rodriguez, Inwood's Council-member, and the entire Council, to do the right thing and support the community's better plan.

Citizens Defending Libraries

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July 10, 2018

City Council Subcommittee on Zoning and Franchises
Council Chambers
City Hall
City Hall Park
New York, New York 10007

FOR THE RECORD

Re: Testimony respecting proposed sale of Inwood Library for redevelopment and upzoning of the Inwood community

Dear City Council Subcommittee on Zoning and Franchises:

Don't let the NYPL and de Blasio administration put another notch in the belt sacrificing a public library to real estate interests with real estate deals that harm and don't benefit the public as they waste and squander public assets. We are asking that your committee and the City Council not let another such notch be put in that belt with the sale for redevelopment of the Inwood Library which is tied in with another attack on the Inwood neighborhood. . . that is the upzoning of the neighborhood as real estate greed goes on the war path.

As the community will surely testify, the upzoning, a radical rezoning, will drastically change the character of the neighborhood with the expected introduction of upsurging gentrification that will displace existing residents. Existing lower income residents are likely to be hit especially hard. Plus what thought has been given to how the existing fabric of the neighborhood and its culture will be shredded as change evicts the familiar and affordable mom and pop stores?

The sale of the library has been laminated to the upzoning. Why? What a strange thing to do. At the developer meeting held in connection with the prospective sale of the Inwood Library the developers when they asked were told by city and library officials the library sale would only go forward if the upzoning goes forward. Therefore the developers were told not to prepare any packages of proposals that did not assume that the upzoning would not go forward at the same time.

But to show you how out of control this process is, a developer at the meeting noted that the Request For Proposal guidelines specified that the proposals for a redevelopment of what is now the Inwood library should take into account the character and nature of the surrounding neighborhood. The developer pointed out that the upzoning was going to change the neighborhood tremendously, probably in ways that can't even be predicted. He asked whether proposals should take into account the character of the *existing* neighborhood or the character of

Citizens Defending Libraries Web Page Information

Citizens Defending Libraries Main Web Page is at:

<https://citizensdefendinglibraries.blogspot.com/2017/12/citizens-defending-libraries-main-page.html>

Or you can read the page LONG FORM if you want to read straight through to go more deeply into topics without clicking on them to do so as you read:

<https://citizensdefendinglibraries.blogspot.com/2017/12/>

Here is the way that our web page now breaks down into important subject headings, each of which can be individually read:

SIGN OUR PETITION TO SUPPORT LIBRARIES (Defend our libraries, don't defund them. . . . fund 'em, don't plunder 'em)

<https://citizensdefendinglibraries.blogspot.com/2017/12/sign-our-petition-to-support-libraries.html>

When Citizens Defending Libraries Started and Why

<https://citizensdefendinglibraries.blogspot.com/2017/12/when-citizens-defending-libraries.html>

Achievements of Citizens Defending Libraries

<https://citizensdefendinglibraries.blogspot.com/2017/12/achievements-of-citizens-defending.html>

What Libraries Are Affected By New York City Plans To Sell Libraries As Real Estate Deals, Shrink And Underfund Libraries And Eliminate Books?

<https://citizensdefendinglibraries.blogspot.com/2017/12/what-libraries-are-affected-by-new-york.html>

Are The Libraries Being Shrunk, Pushed Underground, Books and Librarians Eliminated Because the World Is "Going Digital"? NO, That's NOT a Reason It Should Happen.

<https://citizensdefendinglibraries.blogspot.com/2017/12/are-libraries-being-shrunk-pushed.html>

Are Libraries Just Too Expensive a Luxury to Pay For? Absolutely NOT!

<https://citizensdefendinglibraries.blogspot.com/2017/12/are-libraries-just-too-expensive-luxury.html>

NYC Libraries Are Being Sold For Huge Losses And For Minuscule Fractions of Their Value

<https://citizensdefendinglibraries.blogspot.com/2017/12/nyc-libraries-are-being-sold-for-huge.html>

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WHO Is Selling Our Libraries?

<https://citizensdefendinglibraries.blogspot.com/2017/12/who-is-selling-our-libraries.html>

When Did The Plans To Sell Libraries (Plus The Launching of The Concomitant Underfunding of Libraries) Begin?

<https://citizensdefendinglibraries.blogspot.com/2017/12/when-did-plans-to-sell-libraries-plus.html>

It's Not Just The Real Estate Industry Threatening Libraries: Examining The Panoply of Other Threats

<https://citizensdefendinglibraries.blogspot.com/2017/12/its-not-just-real-estate-industry.html>

Who Is Hurt Most When Libraries Are Defunded and Dismantled? The Poor, The Racially Discriminated Against, Scholars, Future Leaders

<https://citizensdefendinglibraries.blogspot.com/2017/12/who-is-hurt-most-when-libraries-are.html>

How Many Books Are Disappearing From New York City Libraries?

<https://citizensdefendinglibraries.blogspot.com/2018/02/how-many-books-are-disappearing-from.html>

Why Turning Libraries Into Real Estate Deals Isn't The Good Deal Library and City Development Officials Describe

<http://citizensdefendinglibraries.blogspot.com/2017/12/why-turning-libraries-into-real-estate.html>

Selling Libraries And The Broader Issue of Private Sector Plunder of Public Property

<http://citizensdefendinglibraries.blogspot.com/2018/01/selling-libraries-and-broader-issue-of.html>

The Biggest Lies To Watch Out For When Officials Sell Libraries

<http://citizensdefendinglibraries.blogspot.com/2018/01/the-biggest-lies-to-watch-out-for-when.html>

How To Defend Libraries - What You Can Do

<http://citizensdefendinglibraries.blogspot.com/2018/01/how-to-defend-libraries.html>

Testimony Respecting Proposed Sale of Inwood Library for Redevelopment and Upzoning of the Inwood Community

<http://citizensdefendinglibraries.blogspot.com/2018/02/testimony-respecting-proposed-sale-of.html?sref=tw>

<http://citizensdefendinglibraries.blogspot.com/2018/02/testimony-respecting-proposed-sale-of.html>



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FOR THE RECORD

Weaving the fabric of the community

**Inwood Library Development Team
New York City Council Subcommittee on Zoning and Franchises
July 10, 2018**

Good Day To Members of the Subcommittee

My name is Yvonne Stennett, Executive Director of Community League of the Heights. I am very pleased to be here as a proud member of the Team that was selected by HPD and the NYPL to re-develop the Inwood Library.

Our team, consisting of The Community League of the Heights, Alembic Community Development, The Children's Village and Ranger Properties, brings many years of experience and excellence in providing social service programming, affordable housing, and community development in Hamilton Heights, Washington Heights, Inwood and throughout New York.

Our response to the Request for Proposal for the Inwood Library, was and remains rooted in our desire to address the needs expressed by residents of the Inwood community. Specifically, the need for quality affordable housing for individuals and families, as well as valuable human development services through education and health programming.

We recognize that the re-development of the Inwood Library demonstrates the city's commitment in making significant financial and resource investments in



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Weaving the fabric of the community

Inwood. We believe that our teams vision, and plans for the Library is tailored to use this investment wisely and concretely to provide a true neighborhood asset for all.

The “Eliza”, the name chosen for the project clearly identifies with goals in the Inwood NYC Plan for the development of city owned sites.

The “Eliza” will provide a new three level library with programming for all ages. 175 units of 100% deeply and permanently affordable housing serving individuals with annual incomes between \$21,930 to \$43,860, and families of three with incomes between \$28,170 and \$56,340. Rents will range from approximately \$367 for a studio and up to \$1,472 for a three bedroom unit.

The project will also provide space for Universal pre-k with outdoor gardens and play areas. Further, The Activities, Culture, Training and Services Center (ACTS CENTER) will be open to the entire community offering job training, wellness programs, youth and adult education classes.

Recognizing the enormous need for affordable housing that the Library project alone cannot address, The Inwood Action Plan seeks to support private developers in constructing new affordable and mixed-income housing and to preserve the existing affordable housing in Inwood. The Plan also calls for a comprehensive



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zoning framework and improvements of the neighborhood infrastructure. There are several other goals that the community has articulated and which we expect the City to respond to over the coming months as the review of the plan moves forward.

Our team looks forward to working in concert with the city, our elected officials and stakeholders for the ongoing improvement of the quality of life for the residents of Inwood.

Thank you



City Council July 10th

We are a member of the development team. Founded in 1851, The Children's Village annually serves over 15,000 of New York City's children. We work inside 30 of the City's public schools, operate community centers, medical clinics, care for hundreds of children in foster care and juvenile justice and we are the largest provider of temporary shelter for immigrant children in Federal custody. In 2017, working with Alembic Development, we built a Home for Harlem Dowling, finally fulfilling a promise made by New York City, a promise to rebuild the Colored Asylum Orphanage that was destroyed during the draft riots of 1863. A Home for Harlem Dowling finally provides the successors of the Colored Orphanage a home. It also provides 48 affordable apartments to Manhattan's families and 12 studio apartments for youth ageing out of foster care.

At the heart of our success is a simple belief, children do best when families are strong, and children succeed when they have at least one appropriate, willing adult in their life. The ACTS community center at the Eliza is founded on these core beliefs.

The ACTS Center - Arts, Culture, Training and Services will provide Inwood's families the resources most of our own children take for granted – adults who care and provide supervision, engaging activities, access to culture, opportunities for learning and a network to help young adults enter the world of career and employment.

The ACTS Center will offer,

- The Clemente Course, a winner of the National Humanities Medal. Clemente provides free college education through Columbia's core curriculum with credits from Bard College
- The volunteer-driven Open Door reading program
- Urban Farming through Harlem Grown
- Youth activities and technology programs
- Health and wellness for children, families and seniors.
- Youth engagement through the Bravehearts
- Keith Haring Arts and engagement with Inwood's Community Artists.
- After-school and summer activities that embrace the great cultural diversity of our City
- Immigration support
- Foster Care and Prevention Programs
- Support for pregnant and parenting teens, and
- Career preparation, including the Serve-Safe certification in a commercial kitchen.

Again, thank you for this opportunity to testify and I look forward to walking many of you through the ACTS Center in the near future.



New York Hotel and Motel Trades Council, AFL-CIO • 707 Eighth Avenue, New York, NY 10036 • Telephone (212) 245-8100 • Fax (212) 977-5714 • www.hotelworkers.org

Good afternoon and thank you for the opportunity to present testimony today. My name is Katie Moore and I am here on behalf of the New York Hotel Trades Council. Our union's 35,000 members work in hotels across New York and Northern New Jersey, and make up approximately 75% of the hotel industry within the five boroughs.

As is the case with any rezoning in our city, our union places great importance on developer responsibility, community inclusion, and the creation of good jobs. We feel that Inwood NYC is striking this very balance, and we support the City's plan. We believe that the hundreds of Hotel Trades Council members who live in the community will experience immediate quality of life improvements thanks to new investments in local infrastructure, such as parks and community spaces.

We are particularly supportive of the proposal's inclusion of a special permit for hotel use, which we believe provides a critical step toward ensuring community input and the creation of good jobs for locals. The special permit will allow the community to have a key seat at the table during every step of public review for a potential hotel.

While a special permit may limit the development of hotels, we feel that it is the most sensible means of ensuring that any new hotel development suitably fits within the stated purpose of the overall rezoning while providing the most benefit to the community. We strongly support the City's plan. Thank you.



Testimony Karla M. Cruz, GNY LECET
Topic Inwood NYC Planning Initiative
Date Tuesday, July 10, 2018

Good afternoon, my name is Karla Cruz and I am testifying on behalf of the Greater New York Laborers-Employers Cooperation & Education Trust (GNY LECET), the labor management fund of the Mason Tender's District Council representing 15,000 members and 1,200 signatory contractors. More specifically, we represent over 200 hardworking members living in Inwood that are proud members of Laborers Local 78 and Local 79.

I want to start by thanking Chairman Francisco Moya for the opportunity to testify today and voice our concerns regarding the City's proposed plan to rezone the Inwood community. Of particular concern to us is the City's plan to utilize their HireNYC Development initiative.

HireNYC is triggered when EDC capital construction projects have a contract value of over \$1 million and when general contractors on HPD projects receive more than \$2 million in city subsidies. HireNYC then requires all qualifying employers to take steps towards hiring New York City residents registered with the program.

Because the administration had failed to make public the data regarding HireNYC's efficacy, GNY LECET filed a Freedom of Information Law request with the New York City Department of Small Business Services (SBS) to retrieve the information collected from employers through the program's required reporting.

From this data, we learned that as of April 10, 2018, in one sample group of 1,100 Hire NYC referrals, only 162 individuals were hired, leaving 83% of applications pending. According to the data reported to us, out of the 921 pending applications, 403 are from over 12 months ago. 187 are from more than 16 months ago. While 664 of the referrals were for construction positions, only 77 people were hired and 579 applications (87%) are still pending.

These numbers, which we received from the City, contradict the administration's claims that HireNYC, in its current form, is capable of successfully connecting local residents to good paying jobs. This data shows that public assets, expended for private development, do not ultimately benefit the taxpayer.



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John O'Hare Management Trustee | Raymond M. Pocino Labor Trustee | Michael Prohaska Labor Trustee | Patrick J. Purcell Jr. Executive Director

AFFILIATES: Mason Tenders District Council of Greater New York & Long Island | General Building Laborers Local 66
Asbestos, Lead & Hazardous Waste Laborers Local 78 | Construction & General Building Laborers Local 79
Waste Material, Recycling & General Industrial Laborers Local 108 | Laborers International Union of North America, AFL-CIO/CLC
Contractor Associations | Building Contractors Association (BCA)



A 13 story, 200 unit affordable project that is under regulatory agreement with HPD and HDC, and has received city bonds, tax credits, and a total of \$72.5 million dollars in HDC funding, only hired two people out of a pool of 35 applicants. 91% of applications are still pending.

Even if employers on this project had hired HireNYC referrals, that does not necessarily lead to good, safe jobs. The aforementioned project is illusory of this; it recently had a partial stop work order due to a Department of Buildings inspection on July 2, 2018 when unsafe site conditions were found. On June 13, 2018, this same project was cited for a potential fall hazard and general contractor L&M was fined \$5,000. On August 2017, L&M was fined \$8,000 after a worker fall.

This is not an isolated case, or a stand out job site. The laxity and ambiguity of EDC and HPD's procurement and funding processes have lowered and deteriorated standards in the affordable housing industry. Developers and contractors are not held accountable when receiving financial assistance on city-funded projects. Low-road contractors continue to win lucrative projects even after exploiting workers, poor-quality construction records, and/or corruption.

Millions and millions of tax payer dollars are handed out to unscrupulous contractors to subsidize higher profit margins.

How can this council continue to support irresponsible development?

How can this council continue to rezone low-income neighborhoods without ensuring strong responsible contracting policies are implemented that mitigate the threat of displacement and protect our most vulnerable workers?

How long will this council allow public dollars to be diverted from our communities and into developer's pockets without the most minimal commitment to creating good jobs for New Yorkers?

We ask each member to reject the City's ineffective local hiring plan and instead commit to meaningful reforms and adopt responsible contracting. We ask for this council to be the progressive champion it claims to be, take responsibility, reject the status quo, and stand up for New York City's workers and the Inwood community.

Thank you.



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Contractor Associations | Building Contractors Association (BCA)

MIH cannot address the housing needs of half of income Inwood residents—those most at risk of losing their homes. 28% of Inwood households earn less than \$24,500 per year. MIH won't help them. Theoretically, the closest MIH can come is "Deep Affordability" Option 3 with an average of 20% of units at 40% of AMI, which, at \$37,560 per year, over 50% more than the income of almost 4,300 Inwood households. No way will they qualify. That's almost 12,000 extremely low income people at especially high risk of losing their homes to even small rent increases. But it's worse. Developers must get a choice between Option 3 and another option. And no for-profit developer will choose Option 3 because it does not qualify for the 421-A tax exemption.¹ Next best is Option 1, with an average of 25% of units affordable for incomes averaging 60% of AMI, or \$56,340 for a family of 3. That's not only out of reach to the lowest income Inwood residents, it's well out of reach to OVER HALF of Inwood's families, as Inwood's median household income is only \$41,687, about \$15,000 too low to qualify for the average MIH apartment. That's over 21,000 people in over 7,600 households considered "very low income" by the City—people at risk of losing their homes to modest rent increases. And with the other 75% of apartments attracting a much wealthier population, landlords will do—already ARE doing—all they can to raise rents much higher than RGB percentages and deregulate apartments by any legal or illegal means. So, use of MIH will not help the half of Inwood that needs it most. Worse, it may very well add to the City's homelessness crisis by pushing out thousands of Inwood residents.

Sources:

MIH Bands based on AMI: <https://www1.nyc.gov/assets/housing/downloads/pdf/mih-fact-sheet.pdf>

2018 AMI Chart at: <https://www1.nyc.gov/site/hpd/renters/what-is-affordable-housing.page>

Inwood Household Income Distribution: *Inwood NYC Action Plan* June 2017, p. 7

Inwood Population & Average Size per Household used to determine numbers of households above: *Inwood Rezoning Final Environmental Impact Statement*, p. 3-33.

¹ 421-A requires 25% of units to be affordable and Option 3 only requires 20% of units to be affordable. If developers must go to 25% of units for a tax exemption, they will always choose the other choice they are allowed, such as Option 1 which gets them higher rents for those 25% of apartments than Option 3 + reduced rents on an extra 5% of apartments.

Personal Manifesto of Katherine O'Sullivan against the EDC Inwood
Rezoning

July 10, 2018

As an immigrant and citizen, I believe in the great democratic experiment that is the US of A.

I believe that Inwood Library is a significant historic building that deserves preservation in its own right.

The proposed library demolition plan is being used to push the up zoning of the "Commercial U", the replacement library/housing proposal cannot advance without an up zoning - internecine thinking.

Despite repeated requests the Andrew Berman designed proposal has not been released to the public for full review. All we were given is ^{a few} three "pretty pictures". I do not believe Inwood will get a better replacement library for the stated amount of \$10 million.

There is still no location, no budget and no plan for any interim library since this misguided plan was first formed.

ELIZA

The ~~library~~/housing, CLOTH proposal should be built on City property east of 10th Avenue.

All the new residents there will need a library.

As a public project it must have its own ULURP. Will Planning, Dispositions and Concessions subcommittee be reviewing this proposal separately?

Personal Manifesto of Katherine O'Sullivan against the EDC Inwood
Rezoning

July 10, 2018

I believe that this rezoning plan is and has been, since before 2006, a political process pushed by the EDC and the Mayor's Office.

This plan is not about what would make a great neighborhood better, through sound planning principals.

Inwood residents have been involved at every opportunity and have been largely ignored. The plan is being pushed through to achieve political goals at any cost.

This proposed rezoning like many others, Williamsburg, 125th Street, is targeting a community predominantly of color and immigrants.

The displacement resulting from these re-zonings is having a much greater, disparate impact on these communities.

These re-zonings because they target communities like Inwood, are racist.

Please Vote NO!

My name is Phil Simpson I live in Inwood. *in the rezoning area*

I've been a commercial real estate lawyer for over 30 years.

I've also worked at HRA as a policy analyst.

I have a Masters in Public Administration.

I've been engaged with this rezoning for the last year and a half.

This hearing is about a rezoning
I am not going to get down in the weeds ~~here~~, because everyone in this

room knows what this rezoning is about.

~~We keep hearing about housing - but~~
This rezoning is not about housing for working class people - EDC's
low income or

plan for the commercial U exposed that myth. ~~And~~ I our Mayor really

wanted housing in upper Manhattan, he'd tell DOT to give up the

Safety City site and build housing. Instead the Mayor lets DOT keep

that site for a parking lot. *And we've heard from Hotel
Trades Council - anticipating hotel construction.*

The rezoning is not about creating a vibrant small business district -

Inwood has one of the most vibrant small business districts you'll ever

find in this City.

This rezoning is about taking a functioning, working class community, largely immigrant, people of color, women-owned small businesses, and turning it over to real estate speculators and developers.

Even before the rezoning, the speculators and developers were moving in. I've seen it, up close and personal. ~~Everyone in this room should~~

~~know this.~~

for the Council

So the real question ~~before you~~ is simple – Which side are you on?

Are you on the side of the people who live and work and strive in communities like Inwood all over this City, or are you on the side of the speculators and developers who view peoples' homes as just numbers?

Your vote will answer that question. And trust me, your answer to that question will be remembered.

Vote your conscience. Which side are you on?

FOR THE RECORD

Good afternoon members of the Committee and City Council,

My name is Valinn Ranelli and I am an Inwood resident and member of Northern Manhattan is Not For Sale. I appear before you today not only on behalf of myself and the organization, but the hundreds of Inwood residents who filled the evening hearings of Community Board 12 and Borough President Gale Brewer, but who cannot be here because they are at work, paying the living expenses many of us can already barely afford.

As it is your vote that will guide the Council, I direct my statement today primarily to you, Councilmember Rodríguez.

I begin with an important statistic. Leo Goldberg's 2015 MIT thesis study found that neighborhood rezonings of the type proposed for Inwood result in large-scale displacement of communities of color (-15 and -11% respectively for Blacks and Latinos) and all people making below \$25,000/yr.

Not long ago, I attended a concert sponsored by your office, of Latin American protest music, during which an actor playing an oppressed artist under a dictatorial regime repeatedly cried during a monologue "no quiero salir" - I don't want to leave. He could have been speaking for all of us in Inwood too. I saw you get arrested at the DACA march, I saw you at the march against family separation; I have seen you supporting Amanda Morales in sanctuary at Holyrood, so I know you care about immigrants, people of color, the working class and the less privileged among us. What we face in Inwood as a result of the rezoning are the same atrocities I have seen you work publicly against: displacement, dispossession, separation, dehumanization. How can you do this to us, your community and constituency, knowing so well the devastation of the practices and attitudes it is yet another instance of?

Last week, you pulled me aside on the street, for which I thank you. As we talked, what I saw in your eyes was a struggle, a struggle with your own humanity, between serving your constituents and serving those whom the corrupt and undemocratic nature of this system tells you you must. But you have the opportunity to show us that democracy is not dead and represent the people of your district. We have already many times over given you all you need to know about what our community needs and it is not EDC's rezoning. Please, Councilmember Rodríguez, listen to your conscience, find your humanity, represent us and please vote no to the Inwood NYC rezoning proposal.

FOR THE RECORD

To the New York City Council:

My name is Steven Latham and I am an **Inwood resident** and a member of Socialist Alternative, the organization behind Seattle city-councilor Kshama Sawant, who, by taking no corporate money and by only taking the average wage of the worker in her district, has helped to build historic movements *outside* of city hall to win victories *within* city hall such as the first \$15 minimum wage in the country. I'm bringing up Kshama because she is an example of the kind of leader within city government that Inwood and New York City need today.

The point is, you can't serve two masters. You can't serve both big business AND your working-class constituents. You have to make a choice. New York City is facing a housing affordability crisis. Practically everyone is already rent-burdened by one of the most unaffordable housing markets in the country. Homelessness rates in this city are at all time highs with over 60,000 people in the municipal shelter system this year. To make matters worse, the state rent laws are full of loopholes that favor profiteering landlords and lead to evictions, mass displacement, gentrification, and homelessness.

The for-profit housing market has failed. A rezoning plan based on maximizing profits for developers CAN'T solve these problems, no matter how much the EDC gussies up their rezoning plan to sound fair.

A rezoning plan for Inwood NOT based on a for-profit system could do a lot to alleviate the worst effects of this crisis. And that's why I support the Uptown United plan and especially its demand for 100% affordable housing. Frankly, we shouldn't even be talking about what percentages of so-called "affordable" housing such a plan would include. We *should* be discussing a massive public works program for public housing **funded by major tax increases on big business**. My point is that **the demand for 100% affordable housing ALREADY IS the compromise!**

So as a rent-burdened resident, I'm calling on you to make a choice: you can fight for the working class constituents in your districts or you can serve big business, but not both.

The EDC plan favors the developers, but **Inwood needs a rezoning by and for the 99%!**

Vote No. Adopt the Uptown United platform. If you don't, then come election time, we will remember that you sold us out. And we will find representatives like Kshama Sawant or Alexandria Ocasio Cortez who are showing millions of voters that an alternative is possible.

Thank you.

Testimony re: Inwood rezoning proposal
City Council hearing at City Hall, NYC – July 10, 2018
Ted Freed, 85 Seaman Ave., #4A, NYC, NY 10034

FOR THE RECORD

Good afternoon, council members.

Frankly, I am sorry to have to tell you that I have no acronyms or credentials to place after my name. The truth is, I am a mere resident of Inwood. I have lived in Inwood for over 30 years. I'm a retired musician, born and raised in the metropolitan area.

To be honest, for some years, I thought of Inwood as nothing but a place to rent an affordable apartment, and frankly, an out-of-the-way place and entirely an inconvenience. Some of my friends were even afraid to visit; they thought uptown neighborhoods were unsafe.

But many things have changed. Inwood is now seen as not just safe, but even as a destination. For my part, over the years, I've fallen in love with Inwood. Inwood is a wonderful neighborhood, with a unique mix of races, ethnicities, faiths, and outlooks.

It's the people of Inwood that make it special. It's a neighborhood where people know one another, where they stop to chat and share the news, where neighbors gather on the front stoop to play dominoes and talk quietly together, where mothers are out playing with their children in the evening on the sidewalk, where patrons know the owners and workers in the businesses they frequent.

Inwood is indeed busy and urban, but it is also a place with a human scale, a neighborhood with quiet parks - woods and fields - where one can play ball, or just sit quietly and reflect on the day.

This is the fabric of our community.

We now stand to lose all of this.

What is really happening here? Do we live in a democracy? Is it indeed possible that this transformation can be imposed upon us without regard for our needs and concerns? Do we, the residents of Inwood, have any voice at all in what happens to the place in which we live? Should our principal streets be turned from vibrant, lively spaces into dark, unhealthy corridors?

Over the years, I've fallen in love with Inwood. I expect to remain in Inwood and in my apartment for the rest of my life, however short or long that may prove to be. So - am I speaking for myself in opposing this plan? Yes - because I don't want to live in an environment without air and light and space and humanity.

Am I speaking for others? Yes, I am,, because I care about my neighbors who are raising children, who may be immigrants, who are working two and even three jobs to make ends meet - residents who do not have the opportunity to be here today.

I am asking you to work with our community to adopt a rezoning plan that will genuinely reflect our needs. I am begging you, our council members, to vote "no" on the current Inwood rezoning proposal.

Adelle Oltman - Wash. Heights - historian - PhD
Social movements + democracy

FOR THE RECORD

FOR THE RECORD In February Ydanis Rodriguez announced that gentrification is coming to northern

Manhattan “whether you like it or not.” He advised us to [quote] “engage in discussion” about how this gentrification would unfold. We engaged but the process is devised so that we have no power. The City listened but it did not hear. Gentrification is not an impersonal process as Rodriguez suggests. It occurs when people – like you -- make decisions -- to rezone 560 acres in northern Manhattan in order to leverage the private real estate market with tax abatements to build upscale towers and big box stores in a working class immigrant community. You’ve listened to stories about how Inwood/NYC is already increasing rents and affordability levels, displacing working people, adding to a soaring homelessness population, landlord harassment, predatory equity schemes, pressures on small businesses and environmental problems – all of which begin with Inwood/NYC and ricochets north through Marble Hill and south to 155th Street. You’ve read about the violence of gentrification on the poor and working class in mainstream outlets. You have the facts.

Now think about democracy. New York has one of the lowest rates of voter participation in the nation. Last year, Rodriguez was re-elected with fewer than 22 percent of registered voters. An insurgent candidate took nearly 33 percent, a major feat given the arcane rules that protect incumbents. Sixty-something percent of less than 22 percent of registered voters. This shows the crisis of democracy.

Now think about what happened to Joe Crowley two weeks ago in the 14th Congressional. That primary was a shot across the bow of the Democratic establishment in New York, not just Washington. What happened to Crowley could happen to anyone who

votes against the working people of northern Manhattan and for the rezoning of Inwood for commercial developers with tax abatements. Look at the number of people from northern Manhattan who vote with their feet today. We reject money over morals. I urge you to break with the establishment. Vote for what you know is right – not for the real estate industry and the wealthy.

From Congressman
Adriano Espinal

Thank you for hosting today's hearing on the Inwood rezoning proposal. I am submitting testimony today in strong opposition to this rezoning plan, as it will displace thousands of residents and many small businesses that have built up this community over the past several decades. To express support for this proposal would be a disservice to the constituents that elected me to represent their interests in government.

For the past three years, City agencies have been presenting a vision of how to rezone Inwood, and holding forums to allow local residents to speak. The response from the community is appropriately represented in the recommendations from Manhattan's Community Board 12 and Manhattan Borough President Gale Brewer: while there is a way to ensure a rezoning would benefit this community, the current plan is grossly inadequate in achieving this goal, and will be the proximate cause of the net displacement of thousands of my constituents.

Washington Heights and Inwood is home to the highest concentration of rent-stabilized housing in New York City, accounting for 61% of apartments in the neighborhood. While this does provide some protections, approximately one third of these apartments have preferential rents. As the market rates for apartments in the neighborhood increase, landlords are unlikely to continue offering rents below the legal maximum, and can cause rents to spike to levels unaffordable to current residents as soon as their current lease is up. This places the 3,000 preferential-rent households in Inwood, and over 12,000 preferential-rent households in Community Board 12, at a significant risk of displacement.

The best way to ensure ^{that} rezoning benefits local residents is to create affordable housing, which is why I have proposed the creation of 5,000 affordable apartments in Washington Heights and Inwood. This vision relies on additional investments from the City, non-profit organizations, and private investors to utilize prospective sites to create 100% affordable developments, and would ensure that Washington Heights and Inwood residents receive their fair share of affordable housing under the City's ambitious Housing New York plan. As a starting point I have presented fifteen potential sites locations, which could create 3,800 apartments.

I also have strong opposition to the inclusion of the "Commercial U" in the rezoning. While there are clear potential benefits to repurposing largely-industrial areas east of 10th avenue if done correctly, allowing greater development west of 10th avenue will drastically change the character of the neighborhood. This will directly lead to the displacement of mom-and-pop small businesses through the demolition of one and two-story buildings for the purpose of building luxury apartments, and likely result in an increase in national chain stores obtaining retail space. The inclusion of the "Commercial U" in the rezoning will yield minimal benefits in terms of affordable housing, but will inevitably fuel the hyper-gentrification of the area. ~~████████████████████~~

In addition, there are many concerns relating to the administration's ambivalence to including labor provisions in this rezoning. There is no attempt promote local hiring on construction project, provide prevailing wages, or provide safety training. Even the Inwood Library project, which is receiving significant subsidies to support the creation of a new library and affordable apartments, does not have union labor requirements, and the workers will likely have low wages and no benefits. The provision of high-paying union jobs for this community would be a boon to the neighborhood, and better enable Inwood residents to stay in the neighborhood they know and love.

These concerns pertaining to the lack of affordable housing and inclusion of the Commercial U have been presented to the administration on many occasions, and the City has not taken steps to improve the plan. My neighbors and I are the people who took back this neighborhood from the drug dealers that ran these streets in the 1980s and 1990s. Now that Inwood is an appealing neighborhood, with safe streets, lush parks and strong transit options, we must make sure this administration does not take actions that will displace us.

Presenters: Bernyette Elkind
Cliff Elkind

Statement by an Inwood Small Business owner whose immigrant father arrived in the '60's and in the mid-eighties bought a supermarket in Inwood:

A few of us started the INWOOD SMALL BUSINESS COALITION, to speak not on behalf of city officials or residents, but small business owners.

As everyone knows, rezoning will raise everyone's property taxes, which are usually passed through to small business. If this zoning proposal goes through unchanged, we will have closed storefronts everywhere, waiting to be demolished, for years and years.

Why would city officials agree to such a drastic rezoning? Why are we pulling the carpet out from underneath minority and women owned businesses and why are we doing it without their input. If you are for the people, you must listen to the people.

I am not against rezoning, but I am against this irresponsible current Inwood rezoning plan. I am a small business owner, but I am also a developer and builder. Rezoning is good if its done right with true community outreach. I own a development site in Inwood. I went for a rezoning upgrade, which was met with strong resistance. I met with many community organizations, and working together we came up with a plan that both sides are happy with.

The big misconception is that you can't produce affordable housing units throughout Inwood without drastically rezoning Inwood. Instead, there are 421-A and many other HPD programs, which will meet the City's goal of affordable housing units and keep developers in the black with their investments. It is a no-brainer. Any developer in INWOOD can take advantage of these programs and thus create affordable housing without drastically up zoning Inwood, and crushing the small business community. I'm doing it, and it makes financial sense, and I believe most future developers in INWOOD would do the same.

If small business is paying 30 to 50 dollars a square foot now in commercial rents, what will rent be like after a developer just invested 25 million to put up a high rise to lease at 80 to 100 dollars a square foot. Say bye-bye to small immigrant family business because we are barely paying our rents today. Second, when rents go up, prices on goods go up, so it will trickle down to the residents of INWOOD one way or another financially.

Will small business be allowed to return or will all the spots where we invested 10, 20, 25 years of our lives instead be already spoken for by big business? What will happen to the wholesale businesses along 9th and 10th Avenue? Do you know those wholesale businesses rely on the local Inwood businesses to purchase goods? Once small business is gone, bye-bye wholesale businesses. Who is going to be able to cross the 207th street bridge to do business when rezoning happens? It's a complete nightmare now to cross. What Inwood resident who has experienced everyday life in INWOOD can agree to this REZONING as it is explained to us?

We demand zoning all the commercial U to a R7-A with commercial overlay. We demand a special wholesale district for Inwood displaced wholesale business. We demand retail size caps and restrictions on store fronts: any landlord will tell you, it's more profitable to have 4 small stores than one big one, so why wouldn't we demand this. We demand anti-harassment penalties, predictable renewal leases, relocation assistance and a right of return after construction.

We can all meet our goals with an R7-A zoning, with programs for landlords to prosper and programs for small business to prosper and programs for residents to find affordable housing, and for all to be able to live in harmony with light, parks, roads, bridges which are usable and not congested.

If you truly want to listen, we will support rezoning, but this current plan is unacceptable to SMALL BUSINESS IN INWOOD.
NO TO INWOOD REZONING!!!!!!

Ownership in the Inwood Rezoning Area
 Prepared by Lucy Block for the Met Council on Housing, July 2018

Legend

- Rezoning area
- Commercial U
- Owners**
- Toskic, Arzt, Radoncic, Bouskila
- Bauer Family
- Drakotos
- Guterrez
- Kohen & Mizrahi Group
- Lewis Barbanel - Barbary Rose
- Rooney
- Shaul Koplowitz
- Silverman - Bronstein
- Wasserman



Hello, my name is Em Hirsch and I am a life-long resident of a rent-stabilized unit in Inwood. I am a member of Northern Manhattan is Not for Sale and I am extremely concerned about the residential displacement exacerbated by the Rezoning. I have heard city agencies state that HPD's programs will be enough to protect Inwood residents from displacement. **However, HPD's housing preservation has been a failure in Inwood, and there's no evidence they can turn it around at the scale needed.**

In this Rezoning plan, one of the City's main strategies to preserve existing rent-regulated housing is to offer low cost loans or tax breaks to landlords to improve their buildings in exchange for regulatory agreements to maintain affordability for 15 to 30 years. But this is not new. HPD has been trying this in Inwood since at least 2003. In the last 14 years, they only preserved 680 affordable apartments in Inwood¹ or only 48.6 apartments/year. Yet Inwood has over 10,000 rent regulated apartments that are under threat. That means HPD has to multiply its success rate by 15 to 20 times, preserving 750-1000 units/year, to come close to making a difference. There is no evidence they can do that.

HPD is trying a new Landlord Ambassadors program to entice more landlords to take incentives and enter regulatory agreements, but the reported progress has been minimal. They can only get a few landlords with a low number of apartments to sign up. These programs work for small landlords with one or two buildings. But Inwood's rental housing is dominated by companies with vast portfolios, like Barberry-Rose, Koplowitz, or Taconic. They're backed by banks and the last thing they want is an agreement to keep their rents low for decades. They'd rather raise rents as fast as they can through vacancy and MCI bonuses, deregulate apartments, and get low income tenants out so they can rent to higher-paying newcomers. Given 10,000-plus regulated units in Inwood, and speculation headwinds created by rezoning, HPD's puny preservation efforts cannot be counted on to make a difference.

In conclusion, I urge you to please VOTE NO on the EDC's Inwood Rezoning plan, and instead adopt the points outlined in the Uptown United Platform.

Sources:

Inwood NYC Action Plan, June 2017, p. 21 (for HPD's preservation record in Inwood, 2003-2014)

¹ *Inwood NYC Action Plan* June 2017, p. 21.

Good afternoon. I am Jeanne Ruskin, Inwood resident of nearly 40 years. I expected to be saying “good morning”, because we were told that this hearing was to happen at 10 AM but was changed late last Friday to 1 PM. This is distressing because I, for one, distributed over 100 notices last week asking neighbors to attend: they were all given the wrong information. Well, I speak for them, I know.

We are on a precipice of change. What is being done in this community, in this city, in this nation, in the world is nothing short of distributing the common wealth to the already wealthy, leaving “the meek”, those of us with little voice, seemingly with no ability to affect our own destinies – powerless. But what “earth” will be left to inherit? This is being documented well, if you will but read things like the current issue of Harper’s magazine “The Death of a Great American City: New York and the Urban Crisis of Affluence”, or Mindy Thompson Fullilove’s book “Root Shock: How Tearing Up City Neighborhoods Hurts America...”, or Jeremiah Moss’s “Vanishing New York: How A Great City Lost Its Soul”. It is not a secret. The implications are dire.

I appeal to you, Ydanis Rodriguez, and the entire City Council, to stem the tide of corruption and special interests which is determining the future, not just of this community and this city, but of this nation and, indeed, our humanity. If you want a legacy to be proud of, Ydanis, this could be yours. Vote “NO” on the EDC plan to rezone Inwood. You are better than what you have become.

Thank you.

277 words

July 10, 2018

Dear City Council Members,

My name is David Neuburger my sister, Wendy Torres, and I are business and property owners of Magic Novelty Co., Inc., located at 308 Dyckman Street.

We have been in business since 1940, producing and importing component parts for the jewelry, hardware and premium industries. We employ approximately 40 people and have been at our Dyckman street location since 1983.

We are opposed to both the initial rezoning proposal, as well as the A-text proposal, for our area of the Inwood Rezoning, for the following reasons:

- 1) The amended zoning will cause our existing use to become a nonconforming use, and our existing business will not be able to enlarge our operation “as of right”.
- 2) Both the proposed initial zoning, as well as the A-Text proposed zoning, fail to address the split zoning lot conditions of our property and will result in no redevelopment.
- 3) The proposed initial zoning reduces our current “as of right” FAR by over 33%. The A-Text proposed zoning also significantly reduces our current “as of right” FAR.
- 4) We don’t believe the FAR’s proposed will be sufficient to create new residential development. Therefore our property, and our neighbor’s property, are not good candidates for residential conversions, which is a stated goal of the rezoning initiative.

For these reasons we would like our property to be removed from the proposed rezoning action. Thank you.

David Neuburger – President
Magic Novelty Co. Inc.



July 10, 2018

Dear City Council,

Since 1979, Northern Manhattan Improvement Corporation (NMIC) has been providing community based legal services and tenant organizing work in Washington Heights and Inwood to prevent displacement. Through our development projects, NMIC has also provided home ownership opportunities to 350 community members who otherwise may not have been able to purchase an apartment in NYC. NMIC recognizes the need to build affordable housing to address the housing shortage; however, preserving our existing housing is a high priority for us. With the highest number of rent stabilized housing units in NYC, and with at least 27% of the leases in Inwood incorporating preferential rents, WH/I residents are at high risk of displacement unless we draft a rezoning plan that extensively supports anti-displacement efforts. Although NMIC applauds “Universal Access to Counsel”, it is only the first step to prevent the displacement of thousands of people who for decades have made WH/I their homes.

With this background, NMIC makes the following recommendations to protect current tenants and make housing opportunities available to low and middle income families:

- (1) Employ affordability standards that address the needs of Inwood community members who are most vulnerable to displacement by prioritizing their ability to benefit from the rezoning. Such standards should reflect a distribution that allocates 30% of units for families making between \$25,000 and \$89,000 (30% to 100% of AMI); 50% for families making under \$25,000 (<30% AMI), 10% for seniors, and 10% for homeless families.
- (2) Make all housing built on City owned land permanently 100% affordable.
- (3) Provide aggressive enforcement of affordability standards and the Certificate of No Harassment program in WH/I and Marble Hill.
- (4) Ensure the rollout of the Universal Access for Counsel program for Inwood and neighboring Washington Heights zip codes and develop a referral system to prioritize tenant referrals to local community based legal services offices.
- (5) Fund a tenant organizing unit consisting of at least 10 additional Inwood-based NMIC tenant organizers dedicated to supporting tenant associations and continuing to build tenant power in Inwood.
- (6) Increase anti-harassment tenant protection funding that will enhance the capacity of community-based legal services organizations to address the legal needs of newly formed tenant associations.



Respectfully Submitted,

Maria Lizardo
Maria Lizardo, LMSW
NMIC Executive Director



City Council Hearing
INWOOD NYC Plan
Public Testimonial

July 10th, 2018

Dear Chairman and Council Member Rodriguez,

My name is Mino Lora and I am the Executive Director for People's Theatre Project (PTP), an arts and social justice organization based in Inwood. PTP has been working with our Washington Heights and Inwood community for 10 years through our rigorous theatre and social justice programs in partnership with local District 6 schools and at our studio space in Inwood. Theatre is our tool for helping to build the next generation of progressive immigrant leaders of color that our city and country so desperately need. Doing this in our community has been difficult not only for PTP, but also for the dozens of other groups doing artistic work uptown.

I am here today to speak on behalf of not only our 10 year-old organization and the 600 local youth we work with each and every week, but also as a representative of the thriving Arts and Culture community that we have uptown. Over the last 2 years I have served as the chair of Northern Manhattan Agenda's Arts and Culture working group, comprised of leaders from 12-20 local groups who meet each month to identify the top needs and priorities of our Arts and Culture and Arts Education sectors in Inwood.

The following recommendations come from my experience as the Executive Director of PTP and through the work done in collaboration as a committee, through my role as chair for NMA Arts and Culture working group:

1. **We recommend that the Inwood NYC plan include a Cultural Center with a theatre and rehearsals rooms.** Most neighborhoods across NYC have a space where the community can come together to create and be part of a live theatre experience and Inwood deserves this too. Many of our talented artists have to leave our community to go downtown to do their work and our families have to go downtown or the Bronx to see performances that are culturally relevant to them. We strongly support our CM's vision and advocacy for an Immigrant center for the Performing Arts. Our strong and talented immigrant community needs this space to shine and to lead.
2. **We recommend the inclusion of programmatic funds for Inwood based Arts and Culture organizations to bring program to local schools and senior centers.** Over the years we have seen how the arts have continued to be taken away from our students, especially our ELL students, with less and less art teachers hired. We recommend that the

5030 BROADWAY, SUITE 630 | NEW YORK, NY 10034 | 646-398-9062 | www.PTP.nyc

EDC commit to programmatic funding for the arts, in collaboration with DCLA, for CBOs to be able to offer free programs to our schools.

No previous rezoning plan that has passed in NYC has included the arts and culture sector. We support a just rezoning and hope that if the INWOOD NYC plan can meet the needs of our community, a strong investment of both capital and programmatic funds for the arts and culture sector is included.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mino Lora', with a long horizontal stroke extending to the right.

Mino Lora
Executive Director, People's Theatre Project

July 10, 2018

My name is Zoya Kocur and I have lived in Inwood for 23 years. The following testimony pertains to the proposed rezoning of Inwood.

This plan is a textbook recipe for the rapid gentrification of the last affordable neighborhood in Manhattan. The rationale offered for the rezoning is affordable housing, which is a ruse for the opposite, that is, a large scale direct displacement of low and middle income, mostly Latino, residents as well as 179 local and small businesses.

The overwhelming collective response to the proposed rezoning plan for Inwood has been a resounding NO.

The EDC and CB12 and Inwood's elected officials have heard from many hundreds of residents over the past two and a half years, citizens who have united across ethnic, racial, and class lines to protect our community from a reckless and irresponsible rezoning that will destroy the fabric of the community that Latino (now majority Dominican) and Irish and Greek and Eastern European immigrants built, along with other long time residents, black and white and Asian. We in Inwood cherish our neighborhood and we intend to fight hard to stop the proposed rezoning plan. I and many others are advocating for a rezoning that responsibly develops without displacing (the Uptown United plan).

The EDC/City officials have dramatically underestimated the number of current residents who will be displaced and priced out. The displacement impacts will be devastating. Conservatively, the City will need to build tens of thousands of new apartments simply to replace the number of affordable apartments we will lose as a result of the rezoning (based on a percentage of 80/20 market vs affordable). And we all know that "affordable" in the EDC's plan is NOT affordable for Inwood incomes.

People can lose apartments two ways:

Direct Displacement: If buildings are upzoned and the owner decides to demolish them to build bigger buildings:

There are 1,496 apartments in buildings that would be upzoned throughout Inwood, which translates to about 4,160 people at risk of direct displacement.

Indirect Displacement:

There are over 10,400 occupied rent-regulated apartments in the rezoning area, which translates to about 29,000 people at risk of landlords using whatever legal or illegal means they can to raise their rents and displace them for higher-paying tenants. That's almost three-quarters of Inwood's population.

Of these, 3,033 apartments have preferential-rent leases meaning their rents can spike by large amounts at any lease renewal. That translates to over 8,400 people who are at especially high risk of displacement.

Does the Council want to allow a plan that will eventually (and more quickly than anyone anticipates) lead to the majority of the current population of Inwood losing their homes? Will the Council approve a plan that will accelerate through both legal and illegal means the deregulation of the city's largest stock of rent stabilized apartments?

City Council members, there is ample data at your disposal outlining in great detail why the proposed rezoning is a horrible plan. If those who have been pushing so relentlessly for this plan were honest, they would acknowledge that this aggressive and poorly designed plan will destroy Inwood as we know it.

Please exercise your power to vote in favor of the people of New York and the people of Inwood who have built and contributed a community over many decades, and vote **NO** on this rezoning plan.

Respectfully submitted,

Zoya Kocur, PhD
50 Park Terrace East
NY, NY 10034

Sources: Public data on numbers of units per building; ProPublica online maps with data on numbers of preferential rents and percentages of such rents by zip code. ProPublica data also used to calculate number of rent regulated apartments. Numbers of people calculated using EDC's estimate (in the EIS) of 2.78 people per apartment.

Written Testimony for Inwood Rezoning

Hello,

This comment is made with regard to the hearing on July 10, 2018 for the Inwood rezoning and comes from the Inwood Owners Coalition, a group of about 170 residents that focuses on quality of life issues affecting homeowners in Inwood.

Rezoning is complicated even on small sites. This one spans a mile and enables, in theory, up to 16,000+ housing units. (The city predicts, using very flawed criteria, that only 4,300 units will be developed in the next 15 years, but they've been wrong before -- see Long Island City.) When reduced to a soundbite — more housing, fix up the waterfront, some affordable units — what's not to like?

But if you read through the 937-page FSOW or the 27 chapter EIS you will see a lot of flaws. Sure, some people have issues with the affordability, which is related to the MIH debates of a couple years ago and is a topic that is still not very well understood. (For example, most people don't realize that while there is an option for 20% of units at 40% AMI, it can never be forced and developers can always choose at the time of building whether to pursue 25% of units at 60% AMI or 30% of units at 80% AMI, whichever was mapped at the City Council ULURP vote).

And the creation of those affordable units may come at the cost of existing rent-stabilized units either directly (1,300 of them are in the Commercial U section alone and will be under heavy development pressure after being upzoned from six to 11 to 16 stories) or indirectly (thousands of new market rate apartments will put pressures on preferential rents, and Inwood is full of preferential rents).

Besides the affordability issues, there are also serious planning defects. Previous studies under Bloomberg always considered adding a new park along the Harlem River; this rezoning sticks development there instead. It's tough to "reengage" the Harlem River waterfront when that engagement consists of a few scattered development sites with narrow 40 ft public strips, not connected to anything. (The WAP does not include the MTA yards or the ConEd lands). In fact, the cutesy watercolor rendering on the top of the EDC Inwood page is a total farce because it's not even in the rezoning area! That stretch is ConEd and will remain industrial blight (Oops.)

The new zonings are a couple notches beyond what would be rational for the area. Remember that Inwood is somewhat unique in having a lot of vacant or under-utilized post-industrial land. It is quite possible to take what works — uniform medium-density 8 story buildings, denser than the sidestreets of the UWS but shorter than the avenues there — and copy and paste them over to the former parking lots. Only that is not what the city is doing — for EDC purposes, they seem to want commercial uses on practically every block, topped by buildings as tall as 30 stories. That's insane when Inwood is 98% buildings of 8 stories or less, and when those kinds of densities are not found north of Central Park. The community has been begging for two years for R7A, R7D or R7X on these eastern parcels but the city has refused to budge from R8 and R9 variants.

Then there is the issue of the commercial U, which absolutely nobody asked to be rezoned. Bad enough it will now be 11 stories (14 to 16 at the subway corners), which will cause a lot of disruption, but the city also slipped in a last-minute change to flip Broadway and 207th from R districts to C districts. Someone is playing games with trying to force an office district or hotel district, or to allow big box stores and nightclubs while trying to claim the plan supports local retail. It smells.

It smells almost as bad as the 27-story hospital expansion that EDC slipped in halfway through the process. (Wait, I thought this was all about building affordable housing? Nope, guess again). So the new housing in that area will now have no critical mass and be terribly isolated while parking lots remain blighted in the hope that one day the Allen Hospital wants to expand. Meanwhile Baker Field across the street was carved out of the rezoning, since heaven forbid Columbia have to build contextually should they one day give up football and plunk dorms along 218th St. (Note that NYP and Columbia have issued "no comment" through the entire 2 year process of hearings and meetings.) The supposed carrot for all of this is a blanket R7A over existing R7-2 residential Inwood. (Well, north of Dyckman anyway. South of Dyckman got the shaft – enjoy your future Sherman Plaza spot rezonings!) The R7A is a start, but doesn't address the many "soft" sites and therefore is not really the "preservation" the city claims it is. Inwood has lovely small buildings and blocks that many people assume are historic districts, but they are not, and they just got upzoned 11% (R7-2 Narrow to R7A). Bye-bye Seaman Drake Arch too, you're not even listed in the EIS as a historic resource! There are also no new schools, no new police precinct, no community center, no transit or traffic fixes, nothing that the neighborhood has been after for years. It's simply new housing and other political fantasies, at any cost. People are right to be furious at the City for how they have run the process and refused all rational suggestions to improve rather than harm Inwood. It's not about NIMBY, it's about fixing a flawed plan.

Please vote no and send it back to the drawing board.

Regards,

David Thom, for

Inwood Owners Coalition
Inwood, Manhattan
inwoodowners@gmail.com

Home / Projects

Inwood NYC Planning Initiative



Future view from Sherman Creek at Academy St, looking west

Last Updated June 18, 2018

Inwood NYC is an ongoing conversation with the Inwood community, shaping the future of this great New York neighborhood.

Inwood NYC Action Plan—Winter 2018 Update

Since releasing the Inwood NYC 2017 Action Plan, the City has continued working to keep Inwood an affordable and attractive neighborhood for working families.

THE WATERFRONT SHOWN IN THIS RENDERING IS NOT EVEN INSIDE THE REZONING AREA!!

[Plan; Hold a Spanish-Language Resource Fair](#)

My name is Ted Gallagher, Esq. I have resided in Inwood at 1793 Riverside Drive, Apt 4-C (corner Henshaw St.) for the past 35 years. I have a master's degree in public policy from the Graduate Center of the City University of New York, and a law degree from Brooklyn Law School. I am a retiree from 31 years of service as a New York City municipal employee, the last 17 years of which were as Senior City Planner in the New York City Department of Housing Preservation and Development (HPD), Office of Intergovernmental Affairs.

My comments deal specifically with my block, bordered by Staff St.; Henshaw St.; Dyckman St.; and Riverside Drive.

Let Stand the Existing Zoning Designation for the South Side of Dyckman Street, West of Seaman Avenue

Henshaw Street is effectively a service road for the Henry Hudson Parkway. Drivers use it to avoid the Henry Hudson Bridge toll.

Even without the proposed zoning changes that could lead to five additional nine-story apartment houses along Dyckman Street west of Seaman Avenue, the noise and traffic congestion today on Henshaw Street is a grave nuisance. Henshaw Street is a choke point into the neighborhood; any additional traffic in this area will only degrade the quality of life for the existing residents along Riverside Drive.

[Years ago the NYC Board of Education presented the neighborhood with a proposal to build a middle school at the old bakery site, at the southwest corner of Henshaw Street and Dyckman Street. The public hearing was attended by well over 1,000 residents from all over Inwood; virtually all the speakers condemned the plan, for the reasons cited above. The proposal was withdrawn.] Massive up-building of this fragile strip, as you propose, would only bring the same added gridlock and misery to the area that led us to oppose the school project.

The proposed zoning could also very well lead to the loss of the parking garages along Dyckman Street, between Henshaw Street and Payson Avenue. These resources are treasures in our community. Please study the impact that hundreds of additional cars needing street parking would have on the quality of life for residents of Riverside Drive.

The commercial strip along the south side of Dyckman Street, west of Seaman Avenue, is a vital part of the community and should be preserved. Few Manhattan neighborhoods have a first-class bike shop; a gas station; and a car wash, all thriving. These businesses are long-standing and provide sorely needed employment. There is also a Manhattan Mini-Storage facility on this strip, as well as a costume jewelry manufacturer, not to mention the massive parking garages that so effectively relieve parking congestion in

the neighborhood. Preserving this commercial presence not only brings vitality to the community; it also tamps down the infrastructure demands that would ensue from the creation of many hundreds of new residential apartments. At nights and weekends, and seasonally during warm weather, the pedestrian traffic and roaming car traffic along this Dyckman Street strip increases exponentially. The Marina night club on Dyckman Street and the Hudson River attracts so many cars that Riverside Drive and Henshaw Street are grid-locked, sometimes for hours. The resultant horn-blowing and fighting are unbearable. Creation of new housing here would only add new burdens that are unfair.

Rezoning of Dyckman Street west of Seaman Avenue for residential housing would be a mistake. Even if the newly built housing from rezoning were *free*, the residents of the surrounding apartment houses would not want it, because it would degrade the already precarious quality of life we now face every day. For the above reasons, please let stand the existing zoning designation for the south side of Dyckman Street, west of Seaman Avenue.

I will begin by urging you to vote “NO” on the INWOOD rezoning plan.

The NMN4\$ coalition has worked with a board range of neighborhood people each with their unique set of skills to produce the UpTown United Plan that actually addresses the issues of our community and is the plan we urge you to support.

I compliment Community Board 12 for their independence and diligence in voting No with recommendations that mirror the Uptown United Plan.

Borough President Gale Brewer also voted No with recommendations.

The third ULURP review goes to the City Planning Commission, which oftentimes has been described as “an enabler of developer-driven project’s.” It was no surprise they approved the EDC plan.

Commissioner de La Uz was quoted saying, “ULURP unfortunately fails to address the community’s primary concerns. It is extremely disempowering for residents to be engaged and then not be listened to, especially when what the residents are sharing is in the City’s best interests and advances inclusive growth and equity.”

The EDC’s testimony claims it reached out to the Inwood community for the purpose of gathering community input to be incorporated into the rezoning plan. Nothing can be further from the truth. I’ve attended all the workshops. Each is a carbon copy of the other. The sole purpose of these workshops is to promote the EDC plan. The workshops are an elaborate charade with maps, charts, sticky notes, small group discussions and then a large group share. If the EDC listened and took serious note of what was said during the share, they would have made changes. That is, if they were really interested in community input. Over the 2 1/2 year process they have ignored input from the community.

The Board of directors of the EDC and the 13 City planning commissioners are either appointed by Mayor deBlasio or indirectly approved by Mayor deBlasio. Sad, but not surprising to find the EDC and CPC supporting the mayor's policies.

I am asking the city council to find your inner Alexandria Ocasio-Cortez voice and vote No on the EDC plan and consider the Uptown United Plan.

Councilmember Rodriguez we know your office has been inundated with calls for you to vote NO. Sadly, your response was to send out a press advisory entitled, "Building A Community For All: Council Member Ydanis Rodriguez's Priorities in Inwood Rezoning." This 5 point proposal has good ideas, however, none of the 5 points are controlled by rezoning. Moreover, they are truly a distraction from the real issue of rezoning.

Councilman Rodriquez, I am asking you to reunite with your inner Alexandria Ocasio-Cortez voice and take the socially responsible action and vote no on the EDC plan.

Testimony submitted by Denise Rickles on the July 10, 2018 City Council hearing on the Inwood Rezoning Plan.

Joy construction, partner of Madd Equities, is a low-road developer and General Contractor. They subcontract with Auringer-affiliated companies such as US Crane and Rigging, and Urban Erectors, New York Precast, and others. The various Auringer companies have had close to 200 violations from the DOB in the past 10 years, two wage theft class action lawsuits, one of which was settled with over 70 workers, a racial discrimination and sexual harassment settlement with EEOC, and many accounts of abuse, exploitation, and unreported injuries and accidents from current and former employees. This is the risk of building without safety standards. This cost is borne largely and disproportionately by immigrants and people of color working for non-union contractors.

This is one recent accident from the Salvation Army affordable senior housing in East Harlem, where the contractor was cited for failure to provide 16 or 32 hour rigging certifications, failure to provide competent lift director, inadequate rigging gear, failure to have lift director on site at any point in time, inadequate and incomplete daily OSHA logs and operating a crane unsafely resulting in loss of crane load and serious injury to a worker.¹

Joy Construction Corp of Manhattan is the permitted GC on over 30 known projects where Auringer is reported to have worked. Joy did the following projects with Auringer: 1016 Washington Ave², Crotona Terrace (1825 Boston Road)³, The Tiffany⁴, Webster Commons Development (4 buildings) 3556 Webster avenue⁵, 3600 Webster Avenue, 3580 Webster Avenue, 899 Westchester Ave⁶- part of Westchester Point, and 1500 Hoe Avenue⁷, where there was a crane collapse. Joy Construction and Madd Equities partnered on development and construction of Webster Commons.⁸

Joy's wage theft as recent as 2014

http://gothamist.com/2015/11/05/affordable_housing_unions.php

On November 22nd , 2006 an employee working as an overnight security guard on a Joy Construction worksite was found unconscious by the site superintendent.⁹ The employee was transported to Brookdale Hospital, but was pronounced dead on arrival. His cause of death was attributed to carbon monoxide poisoning. It was found that a portable gas generator was being used to power an oil-filled electric heater in the tool shed/office where the employee was found.

In 2004, OSHA cited Joy and two additional contractors for “alleged serious and willful violations” of federal safety regulations at a worksite in the Bronx after a worker fell through a window 64 feet to his death. Joy was cited for five alleged serious violations, in total carrying

¹ <https://nypost.com/2017/09/29/construction-worker-seriously-injured-by-falling-beam/>

² <http://a810-bisweb.nyc.gov/bisweb/CraneNoticeServlet?allcnnumber=024414&requestid=2>

³ <http://a810-bisweb.nyc.gov/bisweb/CraneNoticeServlet?allcnnumber=119415&requestid=2>

⁴ <http://a810-bisweb.nyc.gov/bisweb/PropertyProfileOverviewServlet?requestid=2&bin=2120352> crane not permitted, but NY Hoist is a subcontractor

⁵ <http://a810-bisweb.nyc.gov/bisweb/CraneNoticeServlet?allcnnumber=053314&requestid=2>

⁶ <http://a810-bisweb.nyc.gov/bisweb/CraneNoticeServlet?allcnnumber=104413&requestid=4>

⁷ <http://a810-bisweb.nyc.gov/bisweb/CraneNoticeServlet?allcnnumber=108613&requestid=2>

⁸ <https://www.madddequities.com/webster-commons>

⁹ https://www.osha.gov/pls/imis/establishment.inspection_detail?id=310496609

\$13,500 in proposed penalties, for failure to guard an elevator shaft, a window opening, stairs and landings, and failure to cover protruding metal rebar.¹⁰

We express opposition to the City's plan to rezone Inwood and develop 5,000 new housing units without establishing standards for safety and skill-training, local hire, and responsible contracting practices. The Inwood rezoning still does not contain adequate protections for vulnerable workers and tenants, who are at serious risk of displacement and of exploitation by low-road contractors and developers. The current plan for the Inwood rezoning fails to hold recipients of public subsidies accountable and fails to ensure that future development provide real opportunities to local, low-income residents.

To merit the approval of the City Council Land Use committee, the Inwood rezoning plan must meet certain labor and hiring standards:

- **Responsible Contracting Language.** Public subsidies should not go to developers and contractors who have been debarred, convicted of wage theft, or workers compensation fraud.
- Public subsidies should not go to developers and contractors with records of major accidents, excessive OSHA violations, low safety ratings, and records of racial discrimination and sexual harassment.
- **Local hire and good jobs.** Inwood residents should have access to high-quality construction jobs that provide trade-specific apprenticeship and safety training, pay prevailing wages, and include employer-provided health coverage.

Any rezoning plan that goes forward must ensure capital investment in job training and targeted local hiring goals for the expected construction. The current HireNYC approach is ill-suited for recruiting residents to gain entry into a high-paying career in construction. Additionally, the City has failed to publicly share data showing the results of this initiative. Merely noticing communities in which there are job openings available will not help low-income residents become qualified or get hired into high quality construction jobs. The current approach may get residents hired into construction jobs that require little training (e.g. non-union, low-skill) but those positions do not create the opportunity for a consistent pipeline of work, skills and safety training, or a high paying career. In fact, these non-union jobs construction jobs pay poverty wages, offer no health insurance, and create dangerous work environments for the entire Inwood community; those working on construction sites, and passersby.

¹⁰ <https://www.claimsjournal.com/news/east/2004/08/04/44692.htm>

Find it in OSHA

A TO Z INDEX

[ABOUT OSHA](#) ▾ [WORKERS](#) ▾ [EMPLOYERS](#) ▾ [REGULATIONS](#) ▾ [ENFORCEMENT](#) ▾ [TOPICS](#) ▾ [NEWS & PUBLICATIONS](#) ▾ [DATA](#) ▾ [TRAINING](#) ▾

Inspection Detail

Case Status: VIOLATIONS UNDER CONTEST

Note: The following inspection has not been indicated as closed. Please be aware that the information shown may change, e.g. violations may be added or deleted. For open cases, in which a citation has been issued, the citation information may not be available for 5 days following receipt by the employer for Federal inspections or for 30 days following receipt by the employer for State inspections.

Inspection: 1178494.015 - Joy Construction Corp.

Inspection Information - Office: Tarrytown

Nr: 1178494.015	Report ID: 0216000	Open Date: 09/13/2016		
Joy Construction Corp.				
3556 Webster Ave.				
Bronx, NY 10456		Union Status: NonUnion		
SIC:				
NAICS: 238120/Structural Steel and Precast Concrete Contractors				
Mailing: 40 Fulton St. 21st Fl., New York, NY 10038				
Inspection Type:	Unprog Other			
Scope:	Partial	Advanced Notice: N		
Ownership:	Private			
Safety/Health:	Safety	Close Conference: 09/28/2016		
		Close Case:		
Related Activity:	Type	ID	Safety	Health
	Referral	1138171	Yes	

Case Status: VIOLATIONS UNDER CONTEST

Violation Summary

	Serious	Willful	Repeat	Other	Unclass	Total
Initial Violations	2					2
Current Violations	2					2
Initial Penalty	\$16,036					\$16,036
Current Penalty	\$16,036					\$16,036
FTA Amount						

Violation Items

#	ID	Type	Standard	Issuance	Abate	Curr\$	Init\$	Fta\$	Contest	LastEvent
1.	01001	Serious	19260200 G02	09/30/2016	10/13/2016	\$8,018	\$8,018	\$0	10/06/2016	-
2.	01002	Serious	19260201 A	09/30/2016	10/13/2016	\$8,018	\$8,018	\$0	10/06/2016	-

Occupational Safety and Health Administration
200 Constitution Ave NW
Washington, DC 20210
☎ 800-321-6742 (OSHA)
TTY
www.OSHA.gov

FEDERAL GOVERNMENT

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EXHIBIT E
TO SUPPLEMENTAL DECLARATION
OF STEPHEN H. PENN

SETTLEMENT AMOUNT BREAKDOWN

KONE v. JOY CONSTRUCTION					
Final Breakdown of Gross Settlement Payment					
Plaintiff	Dates of Employment	Back Pay (W-2 Withholding)	Liquidated Damages (No Withholding - Form 1099)	Attorneys' Fees & Costs	Total Payment
Camara	10/29/2004 - 07/10/2014	\$43,775.56	\$43,775.56	\$44,623.21	\$132,174.33
Diallo	03/14/2013 - 08/13/2015	\$10,943.89	\$10,943.89	\$11,155.80	\$33,043.58
Jawara	03/11/2013 - 07/24/2014	\$21,887.78	\$21,887.78	\$22,311.60	\$66,087.16
Dembele (aka Gory)	09/13/2012 - 06/26/2014	\$27,359.73	\$27,359.73	\$27,889.50	\$82,608.96
Soukounou	02/08/2012 - 07/29/2016	\$13,678.87	\$13,678.88	\$13,943.74	\$41,301.49
Diaoune (aka Sangare)	06/12/2011 - 05/26/2016	\$43,775.56	\$43,775.56	\$44,623.21	\$132,174.33
Doumbia	4/22/2005 - 10/16/2015	\$54,719.45	\$54,719.45	\$55,779.01	\$165,217.91
Traore (aka Diamonde)	10/28/2010 - 02/02/2012	\$16,415.84	\$16,415.84	\$16,733.70	\$49,565.38
Khalifa	01/31/2008 - 07/30/2015	\$27,359.73	\$27,359.72	\$27,889.50	\$82,608.95
Kone	04/28/2009 - 10/02/2014	\$54,719.45	\$54,719.45	\$55,779.01	\$165,217.91
Subtotal		\$314,635.86	\$314,635.86		\$629,271.72
NMM				\$320,728.28	\$320,728.28
Total					\$950,000.00

12 July 2018

To: Chairman Francisco Moya, City Council Committee on Zoning and Franchises
From: Jennifer Wollock
RE: Toxic Carrots

Dear Mr. Moya:

Please vote against the Inwood Rezoning proposal. It will kill this neighborhood by destroying our affordable housing. It will also destroy the education and the future of our children.

The Inwood Library Project and Northern Manhattan Tech Hub are being pitched as routes to prosperity for our working immigrant families, to show that there is something in this sweeping redevelopment proposal for us. That gets it exactly backwards. They are toxic carrots.

“Tech Hubs” destroy affordable housing. This has already happened in Seattle and San Francisco, and all down the West Coast. The East Village is terrified because it knows their looming Tech Hub will do the same for them. (Ask your colleague Carlina Rivera and look at the footage of the 7/10/18 City Council hearing that took place just before yours.)

“Middle Class” tech jobs (as opposed to janitorial jobs) depend on educational excellence. Above all, they depend upon literacy.

The public schools of this neighborhood have been underfunded for years. Eleven public schools in the area have no library of their own. The existing, excellent, prize-winning Inwood library is their lifeline.

The new library project guts the core mission of the library by stuffing a smaller space full of glitzy outside programs, at the expense of the books and reading space vital to our community. Like the failed Central Library Plan (and brought to us by the same designers, the real estate experts of the NYPL board) it “reimagines” the library as something else — a kind of mall for corporate or non-profit tenants, a source of rental income. But this is not a library — and not what our community needs. We need to hang on to the basics, to our foundation. We need to hang on to the few books that we have.

The promoters of these projects may profit from them. The people of Inwood will lose out. Please speak out for us and vote no.

Yours truly,

Jennifer Wollock

Cries and Tempered Glass

My cries go unheard
The glass is tempered in your high tower
Above the realities of life below on the streets.
I am but a spec, from the heights of your view.

You never looked up as you passed me by
Stepping into the protection of your refuge
While I had nowhere to go.
Ironic, this place was once mine.

I lived with the laughter of children
The warmth of families
Who took the time to say hello.
I knew the eyes, the smiles of all.

So you watch from heights above
Avoid the streets below
Avert your eyes to see the truth
Your meals are all "to go."

Let us use this moment now, to keep my sanity
And switch to rhyme to tell you

Regrettably, now I see:

You took my parks my corner bodega
With promises of something better,

You told me it's only temporary
We are doing this for you.

You chipped away my resistance.
I actually believed,

Maybe it is in my interest
How quickly I was deceived.

And when the ground was broken
For towers like yours to rise,

You said just wait awhile
We need to compromise.

So with the first jackhammer
It was my heart my soul that broke

I heard the clanging loud and clear
You lied – my chance revoked.

I was left with nothing
My neighborhood revoked.

I did not resist you
What little resolve I have

Sad though I must say it
True life you'll never have

Behind the glass will come the day
You cannot hide I know it!

You'll understand what's lost today
No way to bring it back.

Where will you sit and reminisce
What neighbor will you seek?

The parks you took for something new
Are now desist from view!

You'll find what I once held worthwhile
Forever now is gone

Not one person will you know
For warmth and but a smile.

Your cries will come from high above
Who will hear below?

The tempered glass will hide your cries
The cries that I now know.

By Porfirio Figueroa
7/6/18 a Poem for Social Justice Displacement

Public Testimony for Inwood Rezoning

Dear New York City Council,

Please find my comments below for submission regarding the Inwood Rezoning:

Having finished my undergraduate schooling in New York and embarking on my career in this city, I began searching for the neighborhood where my then-future wife and I would settle and begin to invest in. We searched through many of the city's neighborhoods in four different boroughs, but I can still recall the feeling of belonging I felt the first time I exited the A train at 207th St. A decade later, I still have that same strong feeling of being home when the train pulls into the station.

I have personally loved living in Inwood for the last ten years specifically for the character of the neighborhood—the diversity of its inhabitants, its geography, its transit access, and its balance of urban and green spaces. Having studied sustainable urban development, I strongly believe that the design of Inwood has a strong influence on these characteristics. Its pattern of 6-8 story residential buildings with corridors of commercial overlays (i.e. stores on the first two floors) is one that has been described as a Goldilocks Density⁽¹⁾—buildings that aren't too tall that one can't get to the top by stairs if need be, yet are dense enough and have enough commercial overlay to support a vibrant community.

I believe the city's plan to rezone Inwood with out-of-context, tall towers, would drastically change the geography of the neighborhood. While I agree that there are many areas within Inwood that would benefit from a development change (for instance altering out-of-date manufacturing and automobile repair zoning, building up commercial areas that are currently only single story, and improving waterfront access), I personally believe that the city is asking for density changes that would break Inwood's already strained transit and utilities infrastructure and would bring Upper Manhattan out of its Goldilocks density, into one where neighborhood interactions and a strong community start to fall by the wayside.

I urge the City Council to consider this as the rezoning plan moves forward. This is our opportunity to maintain the characteristics of Inwood that make it such a rich, sustainable neighborhood, and even to improve it and make it all the more vibrant. Too much density, however, would begin to choke the area, eventually rendering it sterile, serving only short-term real estate interests.

It is in the City Council's hands to develop a good "Goldilocks" plan that will serve the community best and encourage healthy economic growth for all of its diverse residents in the decades to come.

Please follow Community Board 12's March resolution and vote NO on the current rezoning plan. As an alternative, please consider the previously submitted Uptown United rezoning plan.

Thank you,
-Thomas Lewin
10034

(1)
<https://www.theguardian.com/lifeandstyle/2014/apr/16/cities-need-goldilocks-housing-density-not-too-high-low-just-right>not-too-high-low-just-right

13 July 2018

To: The Honorable Francisco Moya, Chair, New York City Council Subcommittee on Zoning and Franchises

From: Jeffrey L. Wollock

RE: Inwood Rezoning and Library Project

Dear Chairman Moya, CM Y. Rodriguez and other Council Members,

Congressman Espaillat has called the Inwood Library Project a “Trojan Horse.”¹ And he is absolutely right. The original Trojan Horse (described in Homer’s *Odyssey*) was a giant, hollow wooden figure of a horse built by Greek invaders as a vehicle to convey a hidden troop of warriors within the walls of Troy, which they had been besieging. At night the warriors sprang out of the horse and opened the gates to the enemy.

The Trojans believed the wooden horse was a gift from the gods. It was of impressive size (14 stories?) and festooned with beautiful trappings. It’s understandable why the Trojans fell for the ruse. The fundamental mistake of the Trojans was to let down their guard when they knew perfectly well that they were under siege. The people of Inwood have not made this mistake. Save Inwood Library has over 5,000 signatures on its petition opposing the library/housing project.

The people of Inwood know perfectly well that they are besieged by developers enabled by city policy. They also know that these developers engage in deceptive strategies. For example,

(a) in the Spring of 2017 the lobbying firm Capalino + Company attempted to launch a campaign using an astroturf “organization” created by themselves called the “Sustainable Inwood Coalition.” The trick was discovered, fortunately before it could get very far. It was noted in the press that Capalino + Company were anxious to “jump-start” a rezoning for Inwood. (Capalino and the de Blasio administration had been caught in the scandal of Rivington House, which dragged through 2016 and led to the resignation of First Deputy Mayor Tony Shorris in November 2017.)

(b) for the last several months work crews wearing green shirts inscribed “Inwood BID” have been seen in Inwood cleaning sidewalks. However there is no Inwood BID; there is merely a desire on the part of the city and others to create an Inwood BID as part of the neighborhood’s rezoning and gentrification. This is being run out of Neighborhood 360, a project of the SBS, and funded by Citibank. They have targeted all rezoning areas, which

¹ <https://citylimits.org/2018/03/06/city-dishes-inwood-library-details-espaillat-sees-a-trojan-horse/>

have a lot of small businesses, which would be driven out if there was a BID, and would make the neighborhood more to the liking of gentrifiers.²

(c) At the Community Board 12 vote on the Inwood rezoning (March 20, 2017,

The first 100 people to show included at least 30 people—they appeared to be people of color and mostly Spanish-speaking—from an unknown group carrying signs that said “I’m N.M.2 100%, New Independent & Fearless, N.M. is not 4 Sale doesn’t represent me.” — The signs appeared to refer to the group Northern Manhattan Is Not 4 Sale, a coalition of residents, community organizations and tenant organizations like the Met Council on Housing that has been a strong critic of the city’s rezoning plan, especially on the grounds that it could result in the displacement of low-income people, and was one of the creators of the Uptown United Platform.

These people were plants, representing no real organization. Who was behind it? We do not know, but whoever they were, they were obviously people in favor of rezoning, which is a very rare species in Inwood.

At the City Council Zoning Committee hearing July 10 we heard several members of the library panel talk about the wonderful work of their organizations. I am very far from disparaging either their efforts or their intentions. Organizations of people dedicated to such worthy causes deserve the highest praise. We can well understand why they were chosen by HPD and the NYPL to adorn this proposal. However, it is important to note that they were not given such an opportunity until now. Why only now?

The fact is that in the midst of a siege by real estate developers 175 units of housing, Pre-K, and a few social services – the exact nature of which is still quite unclear — are a drop in the bucket. They are all good, but there is no reason why the demolition of a building so important to the community as our public library is necessary in order to establish them in Inwood. There are alternate sites available, many of them city owned, such as Safety City on Riverside and 158th.

<https://patch.com/new-york/washington-heights-inwood/uptowns-safety-city-should-become-affordable-housing-pols-say>

As Public Advocate and former council member Tish James wrote in a letter to the City Council on December 9, 2015, “Supporting affordable housing and preserving public assets like libraries must not be competing imperatives. We should not be asked to choose between our need for affordable housing and our libraries.”

<http://citizensdefendinglibraries.blogspot.com/2015/12/tish-james-public-advocate-to-city.html>

² <https://citylimits.org/2018/06/25/boost-to-local-bid-has-some-inwood-rezoning-skeptics-worried/> - I have not found any mention in the press of the cleanup crew or their shirts, but they have been seen by many and obviously are meant to be seen.

So, the general consensus in Inwood is that there is no need for this library project. Its announcement came as a total shock. It is not popular. The social-service organizations have been brought into it in an effort to make it more attractive, as is true of the basic idea of the “100% affordable housing” itself. But the actual effects of these programs in countering the negative impacts of the rezoning proposal or the library proposal itself are minuscule, a mere token. Remember this is the only project that has been made a specific part of the rezoning proposal and has not even been granted the right to a separate ULURP, which it should have, as CB12 has insisted in its final recommendations.

When everybody in Inwood knows that there is nothing wrong with the library — quite the contrary — and that nobody had ever advocated for its replacement, the feeble arguments put forth by NYPL — something about inadequate sight lines and allegedly inefficient air conditioning — stand out as special pleading, and thus achieve precisely the opposite of what is intended. The elevator and stairs and new air conditioning system were put in only seventeen years ago, as part of an extensive renovation and enlargement of the library costing over four million dollars, more than 90% of it city money brought in largely through the efforts of our then City Council Member Guillermo Linares. Six other NYPL libraries were renovated at the same time, all older than the Inwood branch, and to date there has been no suggestion that they need to be replaced. A few years ago, the century-old Washington Heights library — approximately the same size as Inwood’s and just 2 1/2 miles away — needed renovations, and it got them. The library reopened in March 2014 after a \$12.4 million renovation.

Here I can cite yet another deceptive move, The Center for an Urban Future, a think tank and principal promoter not only of the Inwood project but of similar ones that could affect many other libraries, and have already led to the demolition or approved demolition of several, placed Inwood on a list of 10 branch libraries (“Re-Envisioning New York’s Branch Libraries, Sept. 2014, pp.51-52)

located on lots whose size and zoning would allow construction of apartment units in addition to a new branch. Collectively, these branches have over \$57 million in capital needs and because of poor layouts struggle to meet the needs of their communities... and have no obvious architectural or historical value. A number are Lindsay boxes, stretched desperately for space.

None of these criteria apply to the Inwood library except the one about its size and zoning — or rather, *rezoning*.

It is pretty clear that the real reasons for this project have nothing to do with the condition of the building, So what is the real reason for this project?

We do not precisely know because, not surprisingly, it has been concealed, but several observations can be made: (a) The properties lying between the library and the corner of Dyckman and Broadway are extremely desirable from a real-estate point of view, perhaps the most desirable in all of Inwood. They are adjacent to a subway stop and a bus stop,

they are just across Broadway from a strip of bars and restaurants put in by developers only over the last decade or so (the role of bars and restaurants in creating real estate value is well recognized in the trade³), and they command a beautiful park view.

Existing structures are a car wash and several one-story taxpayers, including a popular supermarket. The car wash has been closed, put out of business at a very convenient time, and was subsequently purchased at a very high price by the only bidder, a developer who is getting a lot of business under the present administration. And the library possesses very valuable transferable air rights.

Everything, in other words, points to this project as an elaborate real estate scheme, in which developers sacrifice the maximum potential profitability of one parcel in return for control of a highly profitable assemblage immediately adjacent to it and at least five times as large.

Just this model has been suggested in two publications by two sources under the auspices of the Center for the Urban Future, a think tank that is a major promoter, not only of this Library Project but of a large number of potential other ones. ("Branches of Opportunity," January 2013. On p.43 it is explained that during this time of tight budgets, new funding sources must be sought; library leaders must begin to change public perceptions of how libraries are funded, i.e. more emphasis must be placed on private funding. "In at least a few cases," libraries should consider selling "older, underperforming branches that are valuable as real estate" to raise revenue for new construction. (p.43) Vicki Been of the Furman Center is quoted: "New York City libraries could be sitting on as much as 4.5 million square feet of transferable air rights." Current rules for air-rights transfers are too restrictive and should be far more expansive. As de Blasio's head of HPD (2014-2017), controlling the fate of city-owned housing, Been would be a cheerleader for library/housing projects.

Architect James Lima, in a presentation in December 2014 under the auspices of the Center for an Urban Future and the Architectural League of New York City,, stated:

20:47- 23:06 But just as an illustrative example, this site at 24,000 square feet of additional retail potential at this location could generate as much as five million dollars in land revenues, based on comparable land sales in the area. having researched land-sale comparables in sites including this one, we got an unsolicited all-cash offer for this

³ Hae, Laam. "Dilemmas of the Nightlife Fix: Post-industrialisation and the Gentrification of Nightlife in New York City." *Urban Studies* 48(16), 3449–3465, December 2011, p.3449. Brian Miller, "Wanted: 2BR, Near Bars and Restaurants." *NY Times*, July 15, 2016. <https://www.nytimes.com/2016/07/17/realestate/wanted-2br-near-bars-and-restaurants.html>— Yamil Martinez, a restaurant designer and consultant who grew up in Washington Heights and later "helped create the concepts for such other popular Dyckman St. hotspots as Mamajuana Cafe, Mama Sushi and Papisito Mexican Grill & Agave Bar" (all in the two-block Dyckman Strip), said in a 2013 profile, "I feel like Washington Heights is going to be the next Williamsburg..." <http://www.nydailynews.com/new-york/manhattan/dyckman-st-sports-new-watering-hole-article-1.1352801>

site of twelve million dollars. (Audience titters.) So there's definitely potential out there. (More knowledgeable titters.) So planning for property assemblage — this is not necessarily suggesting any particular action be taken — but it's interesting to look at a site like Rego Park and say, in its larger context, if we were thinking about the potential for these locations that are within the control of the library system, if you thought about it like a real-estate developer would think about it ... there's a very low-intensity use adjacent to this site, a one-story commercial use, that could potentially be assembled, and again, if the community felt strongly about enhancing the significance and the potential for this site, one might think about zoning modification and an assemblage that'll allow for a significantly greater number of residential units, in this case 100 additional residential units, and 34,000 square feet of retail.⁴

At a companion forum in January 2015, one presenter stated:

And again, as the final presentation has shown, and we will see again hopefully, at the end a library is real estate. It's an integral ingredient in urban development. I've studied libraries for years, and many design projects around the country have found it's often a nice placating gesture in a real estate development. You want to do commercial development?: Put a library in it and you win a new public that you might not have had on your team initially. So in short a library has many fronts and functions.⁵

* * * * *
*

The Inwood Library is of tremendous importance to the Inwood Community, and the negative impacts of this project, contrary to the impression given by its proponents, would be huge.

The NYPL project ignores the history of the library in relation to the development of Inwood. The Inwood Library meets the criteria for the National and State Registers of Historic Places, and for designation as a NYC landmark. It is irreplaceable because of its historic, aesthetic, and cultural value. Its very existence is the result of a grassroots struggle on the part of the residents of Inwood, carried out over thirty-six years (1916-1952). Although the NYPL began supplying a certain number of books to the small and independent Dyckman Library in 1902, the New York Public Library did not take it over as a sub-branch until 1923, as the result of years of community advocacy. The new project wipes out and disrespects this long history of multi-ethnic cooperation that is a hallmark of our neighborhood down to the present.

⁴ <http://archleague.org/2014/12/video-branch-libraries-design-showcase-and-policy-symposium/>

⁵ As quoted in <http://citizensdefendinglibraries.blogspot.com/2015/10/>

The Inwood branch library, approved in 1940 but not built until 1950-52, was the first public library opened in New York City after World War II, and the first new library since 1938. Its design exemplifies the groundbreaking work of the national postwar library planning movement and a new chapter in New York City public library design, in which the New York City Planning Commission, 1943-1948, played a major role. (See New York City Planning Commission, *Program for the Public Libraries of New York City*, prepared under direction of Commissioner Lawrence M. Orton by Alfred Morton Githens and Ralph Munn, Consultants (New York: City Planning Commission, 1945); Alfred Githens, "A Theory of Branch Library Design," *Library Journal* 70 (July 1945): 609-13.) This was itself part of the post-war public works program for New York City, along with the Dyckman Houses, which opened in 1950.

The library was planned and constructed by noted architect William Gabriel Tachau (1875-1969) as a distinctive, understated realization of New York City Postwar Library standards in the Art Deco style. It also reflects the supervisory engineering intelligence of Clinton Harris, an African-American architect and civil engineer, who headed the Division of Standards of the NY Department of Public Works.

There is no need or justification for replacing the Inwood Library. The overwhelmingly negative impacts of its demolition, closure, and proposed, shrunken and compromised replacement design must be recognized. The social impacts of any temporary library (not mentioned as even a possibility in the City Council presentation) are, for the duration, similar to those of a library closing. During this indefinite time, certainly three years at the very least, but very likely longer, the lack of a permanent facility would have a similar impact on Inwood as a complete or temporary closure (in spite of the promised "temporary library"), for any members of the community who cannot get to it. And since this facility does not expect to offer anything beyond minimal core services we do not know where any other programs, assuming they even exist, would be offered. To get to them raises issues of finance, physical fitness, custodianship (i.e. children traveling), time constraints, and safety, that will have the strongest impacts on children, parents of small children and those who home school, the poor, the elderly, and the disabled. These are all public space issues. There is a good reason why the Inwood library is the size that it is and why it was built in one of the most accessible locations in Inwood.

The saying "If it ain't Broke, don't fix it," certainly applies here. An unneeded new library would not be better than the functional, prize-winning library (May 2016) we have now. In fact, the plan described to the City Council by Iris Weinshall and her colleagues has the same destructive features and effects as charter school incursions have had on the public schools of our district (as described in the article <https://www.manhattantimesnews.com/our-public-schools-are-under-threatnuestras-escuelas-publicas-estan-bajo-amenaza/>

displacing central library functions (books and safe reading spaces) to make room for the still murky social initiatives of outside organizations in search of free space. Significantly, the library project is backed by the Robin Hood Foundation, which is led by the very

hedge-funders and vulture capitalists (invested in Puerto Rican debt) that lobby in Albany for charters and against funding for district schools.⁶

Our library serves us well. The new library is being redesigned to appeal to an incoming class of gentrifiers seeking shinier, glitzier public spaces. It will be another engine of gentrification.

A myriad of concurrent rezoning impacts make reductions of library services and programs into cumulative impacts. The long, indefinite period of time during which the community must do without a full-service, public space library with reduced-service mitigation *is precisely the period during which the community will be undergoing the impact of the concurrent general rezoning, gentrification and displacement.* The Inwood library is the de facto school library for at least 11 schools. A comment to the Inwood EIS Scope of Work notes that "The already inadequate public school funding makes it impossible for our schools to compensate for the destruction of this library. This allows the point to be ignored (from the same comment) that "The impact on children, local schools, literacy and low-income families without a library for many years must be studied. There are financial impacts on schools and families who do not have access to their free, public library open 7 days a week."

One of the reasons the impact is not considered serious is that "residents would also have access to libraries near their place of work." (Draft EIS) The fact that a very large proportion of library users are unemployed, retired, or school children, and therefore have no "place of work" — or self-employed (working at home) or working in Inwood, in which case their place of work is still in the same library catchment area — is completely ignored. Finally, with regard to Child Care Services, it is not acknowledged that the existing library plays an important role in child care as a safe place for children after school. A temporary library would not have sufficient space to perform this function.

The lack of democracy concerning the most democratic of institutions destroys the neighborhood's trust — this is another social impact, and not a small one. The extreme lack of trust the project has stirred up is abnormal, because libraries are usually one of the most trusted institutions in a community. A public library is the key to community democracy, but this plan is fundamentally *undemocratic*. In this time of an authoritarian federal government, when powerful interests in city government tell a community, with no consultation or advance notice, "This is what we have decided to do with your library," it does not inspire confidence. Instead of due process, the promoters gave a *sales pitch*. "Redevelopment" and "redesign" sound better than "demolition", "downsizing", and "having to make do with a storefront library for whatever period of years." Public assets must not be sold or given away. *A library is a common good and a public space*, not tokens in a game with developers looking for maximum profit. Affordable housing is a public good, but it is not a public space. Once lost, a public asset is not coming back. People felt strongly about this as well. Inwood, as is well known, has a very high

⁶ <https://www.thenation.com/article/9-billionaires-are-about-remake-new-yorks-public-schools-heres-their-story/>

population of immigrants and their children, who make much use of the library. Vårheim found that normally, libraries significantly help in the creation of social trust and social capital.⁷ But in an environment where these people (who are the most vulnerable to the impacts of zoning) at the same time experience decreased trust in the library as an institution, one would expect their level of social trust in general to also be affected — and this is a serious social impact.

Equity of access is a form of environmental equity: the impacts of library service disruption affect some groups more than others, including long-term impacts. Extensive studies show that minority, immigrant neighborhoods suffer more from the deprivation of library services through closures (temporary or permanent) than other communities with greater literacy resources. Our community lacks school libraries, bookstores, reliable internet access, and economic resources. The public library is in many cases our only lifeline. A major study of library closings in the Miami Dade (Florida) system found that library closings disproportionately impacted Hispanic and low-income communities, as well as seniors on fixed incomes. Closing of a local library meant loss of a safe space for kids and teens, and these cohorts could no longer get to a library on foot.

* * * *

These are the thoughts and observations of one resident of Inwood, drawn not from maps, graphs, and charts, but from living knowledge of the community where I have lived for over three decades, have raised a family, and which I love. I ask all members of the City Council to consider this decision carefully. This rezoning proposal was drawn up by big real-estate; there is nothing in it that is good for Inwood. Like the 70/30 MIH formula, in all other aspects as well it is two-thirds for the 1 percent and one-third for the 99 percent, effectively canceling out anything good that might have been intended for the 99 percent. Because while you are building affordable housing — very little of affordable to the people that need it the most — you are at the same time increasing the stock of luxury housing, thereby promoting hyper-gentrification and displacement of people, especially in majority-minority communities like Inwood. Please vote no to this rezoning proposal. Inwood has many needs, but this is not the answer.

⁷ Andreas Vårheim, "Trust in Libraries and Trust in Most People: Social Capital Creation in the Public Library," *The Library Quarterly* 84(3), July 2014, 258-277.

Dear New York City Council Members,

I am a life long resident of Northern Manhattan, educated in our local schools, taught in our public schools, am an active member for 40 years in my local church. Inwood still represents the diversity of the city. However, tenants are being harrassed, intimidated and paid off to leave so that their apartments can finally be fixed. Then rent raised to market value, which the average resident here can not afford.

The maximum affordability in the city's plan is 20-30%. So these tall high density buildings will still have a majority high density market rate apartments. Overall market rate goes up, small business rents go up, preferential rents go up. Our beautiful diversity will turn into another homogenized socio-economic neighborhood. Where will the workers that keep our city going, live? It's ludicrous, immoral, criminal!

You were elected to represent us not big money interests!!

I implore you to vote your conscience not your politics! God have mercy on all of us if the city's plan goes through!

What has always made New York City a liveable and exciting place to live is it's diverse ethnic neighborhoods. This rezoning will be the death nell of our beloved community!

VOTE " NO " ON NYC INWOOD REZONING PLAN!!

Jessica Matei
235 Seaman Ave.
New York, N.Y. 10034

Dear City Council sub-committee considering NYC Inwood Rezoning,

I appreciate this opportunity to submit testimony in writing, as I was unable to attend Tuesday's hearing.

I am a resident of Inwood (on Seaman Ave) with my partner and our son (who attends PS 178, along with many other children from Inwood). We love our neighborhood: it is diverse with respect to class, income, language, and race. Our son can study English and Spanish together, learning from peers for whom Spanish is a first language. I am a professor and historian and often do my writing and research in our wonderful neighborhood library alongside older folk reading newspapers and novels in multiple languages, professionals doing business, tidily-dressed (but clearly not wealthy) individuals composing resumes or doing research, and many children reading and playing. My partner is an opera singer, many of whose colleagues also live in Inwood---one of the few places in Manhattan where artists and performers can still (just barely) afford.

I believe we would lose this neighborhood culture and its diversity in the face of rezoning. My family can barely afford to live in Inwood already (and I have a PhD and a good job). Our rent-regulated apartment building recently filed suit against our landlord, who appears to be working to free the building from all rent regulation and to displace my neighbors, many of whom have lived in this neighborhood for over 40 years on fixed incomes. Our library too appears slated to be closed for many years so that a high-rise can take its place. We've been assured a new library will come with the highrise, but that will not help our community in the meantime and I fear that library will be less socioeconomically diverse as more of our poorer residents are driven out. All of this is before any rezoning.

I urge the council to defeat this rezoning plan and save Inwood, helping it stay affordable and welcoming of the poor and of people of all backgrounds. The council should instead review the "Uptown United Plan" which promises a kind development that will really help Inwood.

Thank you for your time.

best,

Dan Bouk

Inwood Rezoning - In Favor of Rezoning

Hello,

I know you must be receiving so many emails/calls against the INWOOD REZONING - but actually would welcome it. Yes, I do own my apartment and feel that I have made an investment in the community and would love to see the neighborhood grow with additional opportunities - would love to get CitiBikes up here as well! We have way too many Auto Body shops, Hairdressers - there needs to be better supermarkets - in general greater variety of businesses for all.

I'm writing to basically say I am in favor of the Rezoning and do hope that it passes through.

Thank you for your time.

Best,

Felicia Di Salvo

50 Park Terrace East - 8G

NYC 10034

Inwood Rezoning Written Testimony to the City Council

By Paul Epstein July 13, 2018. For questions: paul@RTMteam.net (212-349-1719 voice only)

Because of the time limit on speakers at City Council public hearing on Inwood Rezoning on June 10, 2018, I am also providing this written testimony so I can comment on additional issues related to the rezoning. This written testimony goes considerably further than my spoken testimony did at the hearing.

My Overall Message to the City Council

The City's Proposal is So Deficient it Cannot be Salvaged with Modest Changes: There are numerous deficiencies in the Inwood Rezoning Proposal and the EIS that supports it, as reflected in this testimony and in many more environmental, social, economic, and urban planning issues. Any one of them is reason enough to reject the proposal. Taken together, EDC's plan is hopelessly—no, tragically—flawed. The City Council is in a position to modify the proposal. But please recognize that the proposed actions are likely to be so detrimental to the Inwood community that modest changes or “tweaks” will not mitigate the likely harms to much of the current population and the environment. Several City Council Members have been presented with the ***Uptown United Platform*** (see Attachment C), the only plan for Inwood to emerge from the community with broad community support. Please take inspiration from the Uptown United Platform in making major modifications to EDC's plan. Those of us who support the Uptown United Platform are not against change. We recognize that a fair, just, nuanced, and balanced rezoning will be beneficial to Inwood. But if the City Council is not willing or able to make major modifications to EDC's plan that, at a minimum, correct all the fundamental flaws I point out in this testimony, then I urge you to reject EDC's plan and ask the City to try again using the Uptown United Platform as the template for change.

A Social and Environmental Experiment with a Flawed Premise and No Safety Net

Before enumerating specific deficiencies in the proposed actions and the EIS, I ask the City Council to reflect on two competing narratives that have been prevalent about the Inwood rezoning practically from the time the process started in 2015. NYC EDC's narrative and that of the community—or at least of the residents and groups who have been most engaged. We are being asked to accept EDC's narrative that the proposed rezoning will be beneficial to the community with only a few minor negative effects, but there's no evidence that is the case. The EIS is so deeply flawed that it cannot be considered “evidence.” So EDC's proposal, if enacted, will make Inwood's residents the subjects of a social experiment with no safety net. If the assumptions behind EDC's narrative are wrong, the current diverse, mixed income, vital neighborhood of Inwood will not only go “upscale” but those most vulnerable will be displaced with many at risk of becoming homeless or losing their livelihoods as small business owners and employees. Also, the infrastructure, environment, public services, and quality of life will be endangered as the rate of gentrification and growth in Inwood is increased.

EDC's Narrative: The city's population is growing and rents are rising, so rezoning is needed to increase the housing supply and relieve pressure on rising rents overall. Meanwhile MIH will provide more affordable housing and preservation efforts will stabilize existing affordable housing, so we'll avoid displacement of current residents even as more affluent people move into new market rate units. And commercial upzoning will add vitality to Inwood's retail and commercial services.

Community's Narrative: The new market rate housing will be the camel's nose in the tent, and all the efforts in the world to achieve voluntary preservation will not keep the rest of the camel out. The

pressure to get existing housing out of regulation will be immense and we'll lose a lot more affordable apartments to gentrification than we'll gain from the 25% or so of new units added that are affordable. And the so-called "affordable" new units will be too expensive for most current residents. The thousands of families with "preferential rents" will be especially at risk. And our retail sector already has great local vitality, thank you. But rezoning will endanger that, as many of our locally-owned small businesses will be displaced by upzoning as they have even fewer protections than residential tenants.

Why EDC's Narrative is Wrong: *Many of the arguments below are also made in later in this testimony, especially under "Residential Displacement" and "Vastly Understated Development Scenario," including more facts and citations to support my arguments. Arguments against EDC's narrative are consolidated here and expanded in later sections.* EDC's narrative is based on seriously flawed assumptions, for example:

- It is based on flawed economics. EDC's narrative assumes demand for housing in Inwood from people who live outside the neighborhood is relatively inelastic, so all the new development will absorb people who want to move here. In reality, new development in a strong real estate market drives increased demand for housing (i.e., demand is elastic) and will attract more people, driving rents up not just in new developments but in existing housing. Former CPC Chair Amanda Burden admitted at the end of her tenure that this "supply side" approach did not work in the prior administration:
 - "What we haven't figured out is the question of gentrification. I have never, since I had this job, come up with a satisfactory answer of how to make sure everyone benefits ... I had believed that if we kept building ... and increasing our housing supply ... that prices would go down. We had every year almost 30,000 permits for housing, and we built a tremendous amount of housing, including affordable housing, either through incentives or through government funds. And the price of housing didn't go down at all."¹
- The current administration's policy is essentially the same "supply side" approach used under Bloomberg and Burden, except that inclusionary housing is mandatory (MIH) instead of voluntary. But MIH is untested in communities with relatively low median incomes and a high percentage of low income people such as Inwood. The City did not invent MIH. These kinds of inclusionary policies were introduced in progressive wealthy suburbs (e.g., Montgomery County, MD; Fairfax County, VA) as ways to create their fair share of affordable housing for lower income residents and integrate their communities.² Gentrification is not an issue when inclusionary housing is introduced in wealthy areas, where property values and median incomes are already high. But the City has stood upzoning for MIH on its head by targeting neighborhoods such as Inwood, East Harlem, East New York in Brooklyn, and Jerome Avenue in the Bronx—all areas where gentrification is a real threat.
 - The City Council report "Desegregating NYC" says that "to realize the potential of MIH to increase overall housing opportunities citywide, and to achieve integration without displacement, the City must also rezone whiter, wealthier neighborhoods to create affordable housing opportunities all across NYC."³

¹ Goodyear, Sarah. "What We Haven't Figured Out is the Question of Gentrification," *The Atlantic CityLab*. Oct. 8, 2013

² Settles, Marc. "The Perpetuation of Residential Racial Segregation in America: Historical Discrimination, Modern Forms of Exclusion, and Inclusionary Remedies," in the *Journal of Land Use & Environmental Law*, Vol. 14, No. 1 (Fall 1998), pp. 112-117 (http://www.jstor.org/stable/42842721?seq=1#page_scan_tab_contents) and Hickey, Robert, Lisa Sturtevant, and Emily Thaden. "Achieving Lasting Affordability through Inclusionary Housing," a Lincoln Institute of Land Policy Working Paper, 2014 (<http://www.miami-dade.gov/housing/library/guidelines/iz/inclusionary-zoning-background.pdf>).

³ Council Member Brad Lander, Deputy Leader for Policy, NY City Council, "Desegregating NYC," April 2018: https://drive.google.com/file/d/17yqKmyjsVXJEzRc-Dxfiz08F8C3MW_n/view

- EDC’s narrative assumes people living in rent regulated apartments are safe from displacement due to rent regulation laws. But that fails to consider the following:
 - Landlords and real estate speculators constantly take advantage of lax and fragmented enforcement of rent laws and housing and building codes, numerous loopholes to raise rents beyond guidelines, and aggressive harassment to force out low income tenants to make way for higher paying newcomers. This has long been known to EDC, HPD, and anyone who pays even modest attention to housing in NYC. *The Times* just made it known to everyone.⁴
 - Even landlords working within rent regulation rules will take advantage of preferential rent riders to sharply raise rents for thousands of families, forcing many of them out of their homes.
 - The modest increase in free legal services provided in Inwood is already insufficient to help all our at-risk tenants, and those attorneys will be further overwhelmed when rezoning increases market pressures on rents even more than the prospect of rezoning already has.
- EDC’s narrative assumes HPD’s “preservation” efforts will substantially add to the number of buildings with extended regulatory agreements adding decades to the time their apartments are “protected” as “affordable” under rent regulation. But HPD has been trying to preserve affordable apartments in Inwood for over a decade and has largely failed, showing meager results.⁵ There’s no reason to expect that in the coming years they will do better. And, as shown later in this testimony, a modest incremental increase in preservation success won’t make a dent in the problem. They will have to multiply their success by 15 to 20 times to make a difference. That cannot be assumed. Also:
 - HPD’s preservation strategies depend on landlords voluntarily taking loans or grants in exchange for 10- to 30-year regulatory agreements. But if landlords foresee a rising rent due to upzoning, their incentive is to wait for that market and do all they can to deregulate apartments rather than lock in lower rents for decades.
 - Therefore combining upzoning with preservation strategies is misguided policy, as upzoning creates headwinds to keep preservation efforts from succeeding.
- EDC’s narrative is supported by a rosy outlook projected in the EIS, which shows no significant direct or indirect residential displacement and very few unmitigated adverse environmental impacts. But, as shown below under “Residential Displacement” and “Vastly Understated Development Scenario,” the EIS is fundamentally based on flawed assumptions and is thus unreliable. No environmental, social, economic, or other impacts forecast in the EIS can be trusted.
- EDC’s narrative does not take into account how important Inwood’s locally-owned small businesses are to the vitality of life and the local economy, as most of the money spent in Inwood businesses stays in Inwood. This will not be the case when those businesses are displaced by externally-owned chain stores, boutiques, and night clubs due to a rezoning that leads to higher commercial rents and offers no small business protections. EDC’s rezoning writes off our thriving small business sector as collateral damage.

Upshot: EDC Has No Evidence to Support Its Narrative, While Inwood Has Too Much to Lose

EDC is asking us to trust that their narrative is correct. But if it’s wrong, and the flaws cited above strongly suggest that it is, there’s no turning back. Rezoning affects a community for decades. So, ***EDC is asking the people who live, work, or own businesses in Inwood to be the subjects of a social experiment and***

⁴ Barker, Kim. “Behind New York’s Housing Crisis: Weakened Laws and Fragmented Regulation” in *The New York Times*, May 20, 2018: https://www.nytimes.com/interactive/2018/05/20/nyregion/affordable-housing-nyc.html?rref=collection%2Fsectioncollection%2Fnyregion&action=click&contentCollection=nyregion®ion=stream&module=stream_unit&version=search&contentPlacement=1&pgtype=sectionfront

⁵ “Inwood NYC 2017 Action Plan,” June 2017, p. 20.

environmental experiment with no safety net. But the stakes are very high. Our built and natural environment is at stake, the adequacy of our public services and crumbling infrastructure are at stake. And, perhaps most of all, our homes, businesses, and jobs are at stake. With the stakes so high, EDC has a high burden of proof—or at least a high burden of credible evidence—that its narrative is correct that Inwood and its people will benefit from the rezoning. But they offer no evidence at all, outside of a deeply flawed EIS that is not at all credible. A plan with such flawed premises and no credible supporting evidence cannot be salvaged by making modest changes at the margins. And an alternative plan exists, the *Uptown United Platform* (see Attachment C), which is much more sensitive to the real issues of Inwood because it was developed from the ground up by people who live, work, and own businesses here. With so many flaws in the assumptions behind EDC’s plan, no credible evidence to support it, so much at stake, and a credible alternative available, if the City Council cannot make major modifications in the City’s plan that address the comments in this testimony, the City Council should reject the City’s proposal and ask the City to try again using the Uptown United Platform as the template for change.

Demand a Different Scenario: Use of Rezoning and Other Tools Equitably Across the City

Imagine if the City’s implementation strategy were different for “Housing New York” and MIH. Instead of targeting a dozen neighborhoods with largely low-income, minority populations, the mayor had declared that absorbing the city’s increasing population and solving the housing affordability crisis is everyone’s issue, and challenged all 59 community board districts (or perhaps all 51 City Council districts) to identify how they would contribute. Not every district would be expected to have an equal amount of development as opportunities differ from place to place. But if every district participated, it would create more balance and reduce the burden on a few targeted neighborhoods. It may not be practical for the City’s planning and development agencies to work on area-wide rezoning plans in 50+ districts at a time. They could work on, for example, 6 to 10 per year, with each year including a socioeconomic mix of communities (e.g., the Upper East Side and East Harlem; Jamaica Estates and East New York) with appropriate tools used in each community. So upzoning for MIH would be used, for example, in upper middle class to wealthy neighborhoods where there is no real risk of gentrification. In working class neighborhoods, *before* rezoning, other efforts (e.g., use of government property for 100% affordable housing and robust preservation efforts including major commitments from the City’s acquisition loan fund) would be used to increase and stabilize the stock of affordable housing in those areas. Only then would underdeveloped areas in low income neighborhoods be rezoned. But, with inclusionary upzoning also in wealthier neighborhoods taking part of the burden, upzoning of lower income neighborhoods would not be as drastic—it would not need to be. So, in Inwood, for example, rather than creating districts in the east with 27- and 30-story towers, these districts could be kept mostly at the 6- to 8-story scale of almost all of Inwood to the west while still providing opportunities for inclusionary affordable housing.

Of course, the mayor did not choose this implementation scenario. But the City Council is in a position to demand it. The first step would be to say “enough is enough.” The City is already subjecting enough working class neighborhoods to social experiments of upzoning without a safety net. Instead of adding another, ***the City Council should reject the Inwood proposal and demand a more equitable citywide development approach such as that in the scenario outlined above.***

Residential Displacement

In her negative recommendation on the Inwood Rezoning Proposal, Borough President Gale Brewer cites “enormous concerns and fears among Inwood residents” of the loss of their homes due to the proposed rezoning. She goes on to say that “these concerns are not irrational” and she does not support the

proposal “because no one can expect a neighborhood to accept a rezoning that raises the specter of displacement in the short and medium term.” Yet, in the EIS, the City does not see it that way. The EIS projects that there will be no direct residential displacement at all and that indirect residential displacement will be insignificant. How can those views be so different? Are the Borough President’s assessment and residents’ views alarmist? No, the EIS uses flawed methodologies that are guaranteed to understate residential displacement.

The “Development Sites” in the EIS Do Not Include a Single Housing Unit. NOT ONE! The EIS projects no direct residential displacement because no buildings with any housing units were selected as soft sites for likely development—none as “projected development sites” expected to be redeveloped in the next 15 years, and none even as “potential development sites.” Yet there are plenty of rental apartments in upzoned areas—about 1,400 in the “Commercial U” alone, and additional low-scale residential buildings east of 10th Avenue that are likely soft sites. This is simply not credible, given the scale of upzoning in the City’s proposal. See “Vastly Understated Development Scenario” below for more on the flawed criteria used in the EIS to select too few development sites and thus understate the extent of development and virtually all impact assessments. The City Council simply cannot rely on the current EIS for making a decision on the Inwood rezoning proposal.

The EIS’s “Detailed Assessment” of Indirect Residential Displacement Includes Numbers but No Real Analysis: The “preliminary assessment” of indirect residential displacement in the EIS determined that “a detailed assessment is warranted.” Then in the detailed assessment section, the EIS provides lots of data on incomes, housing costs, etc., in tables, maps, and text. But the EIS never provides any real analysis of those data. Nowhere are any numbers crunched to project that so many hundred people are expected to be displaced, or that the range of displacement is likely to be between X and Y. Instead, it relies on flawed assumptions to conclude that “the Proposed Actions are not expected to result in a significant adverse impact with respect to indirect residential displacement.” Basically, the

EIS reasoning is that all the extra housing (including market-rate housing) will relieve pressure on increasing rents overall (the failed Bloomberg/Burden “supply side” approach), and MIH and HPD’s preservation efforts will provide affordable housing to those who need it. The flawed assumptions:

- The assessment of indirect displacement assumes no displacement from rent regulated apartments, even for tenants on preferential rents. In the real world of landlords trying to deregulate apartments and empty their buildings of rent regulated tenants, this is a preposterous assumption. As described in the next section, data show that rent-regulated tenants in CB12 are at very high displacement risk.
- The reasoning assumes that “affordable” apartments under MIH will be affordable to the people most at risk of displacement in Inwood. But income data suggest otherwise. The biggest income-defined population segment in Inwood consists of low income households (below \$25,000/year) that MIH does a poor job of serving.
- This reasoning assumes demand for housing in Inwood from people who live outside the neighborhood is relatively inelastic, so all the new development will absorb people who want to move here. In reality, new development in a strong real estate market drives increased demand for housing (i.e., demand is elastic) and will attract more people, driving rents up not just in new developments but in existing housing.
- The reasoning also assumes the City will be successful at affordable housing “preservation” efforts, i.e., encouraging building owners with rent-regulated apartments to accept new subsidies, low-interest loans, or tax breaks in exchange for regulatory agreements of 15- to 30-years. But there is no

basis for assuming these efforts will be successful. In the “Inwood NYC 2017 Action Plan” the City reported that from 2003–2017 the City has only preserved 680 affordable units in Inwood.⁶ Just 680 units in 14 years! That’s only 48.6 apartments per year! And in the February 2018 CB12 Housing and Human Services Committee meeting, an HPD presenter admitted that the results of HPD’s preservation efforts have been disappointing. So, there’s no reason to believe additional HPD preservation efforts will be any more successful. And given that there are over 10,400 occupied rent-regulated apartments in the rezoning area⁷ a modest incremental increase in success will not be enough. Preserving about 1,000 apartments a year is closer to what’s needed to make a dent in the problem, not a mere 48.6 apartments per year. HPD will have to increase their per year success rate by 15 to 20 times to get close to making a difference. They need to show us they can multiply their success rate by at least a factor of 15 before subjecting Inwood to the risk of rezoning. But they cannot, for two reasons:

- This strategy may work well for small landlords with one or two buildings, but Inwood’s rental market is dominated large-scale owners with many buildings in their portfolio. They have ready access to bank financing. For example, in 2016 Barberry-Rose bought 13 Inwood buildings with 363 apartments in Inwood for \$63.6 million. In late 2017, Blackstone bought 13 apartment buildings at one time for \$243.6 million.⁸ Five of those buildings are in Inwood. The last thing large-scale landlords want is an HPD regulatory agreement to keep rents low for decades. Instead, they want to use whatever legal or illegal means they can to raise rents, deregulate apartments, force out low income tenants, and bring in higher-income people paying higher rents.
- More generally, if landlords foresee a rising rent market due to upzoning bringing in wealthier residents, their incentive is to wait for that market and do all they can to deregulate apartments rather than lock in lower rents for decades. Therefore combining upzoning with preservation strategies is misguided policy, as upzoning creates headwinds to keep preservation efforts from succeeding.

Indirect Residential Displacement: City Contradicts Itself While Data Shows High Risk: The City’s Human Resources Administration (NYC HRA) has funded a special legal assistance office in Inwood to help our lower income tenants fight harassment and threats of eviction, which acknowledges a real risk of residential displacement. Almost all of this office’s clients are tenants in rent-regulated apartments. Yet the Inwood Rezoning EIS says there will be no significant residential displacement—*what a contradiction!* What study of our rent-regulated housing stock did they do to make this assessment? ***None at all.*** They just said the *CEQR Technical Manual* does not require them to assess displacement of rent regulated tenants. In response to our comments on the DSOW that they especially had to study the risk to the 9,200 families in Inwood and surrounding zip codes on preferential rent⁹, the City said they could not get the data to do so.¹⁰ Yet, at the February CB12 Housing and Human Services Committee Meeting, a representative of NYC HPD’s Office of Neighborhood Strategies (ONS) discussed HPD’s analysis of

⁶ “Inwood NYC 2017 Action Plan,” June 2017, p. 20.

⁷ ProPublica’s data for zip code 10034 shows 3,033 preferential rent apartments representing 29.1% of occupied regulated apartments (see <https://projects.propublica.org/graphics/preferential-rents>) which I used to calculate to 10,423 occupied rent regulated apartments: $3,033/0.291 = 10,423$ (data check: $10,243 \times 29.1\% = 3,033$).

⁸ See <https://therealdeal.com/2018/01/03/blackstone-takes-harvards-majority-stake-in-ae-portfolio/> for Blackstone deal.

⁹ Of these, 6,299 are in CB12 zip codes 10034 (3,033 tenants) and 10040 (3,266 tenants), and 2,917 are just to the north in zip code 10643. See: <https://projects.propublica.org/graphics/preferential-rents>

¹⁰ Inwood Rezoning Proposal, Final Statement of Work (FSOW) for the EIS, Appendix 4, pp. 32-33

preferential rent data. *Another contradiction.* The City has the detailed preferential rent data needed for risk analysis, despite what an official from another part of HPD said in the CPC hearing on Inwood rezoning,¹¹ they just withheld it from the EIS as if those tenants will have no problems. But any lawyer who serves low income families knows those 9,200 families are at risk of displacement, and they know other rent-regulated tenants are also at risk. You know it, we know it, the City knows it—they even offer legal services to help them.

The City could have done a study of other risk factors, such as the extent of speculative sales of buildings with rent regulated apartments since EDC first came forward with plans to study Inwood for rezoning in 2015. But the City did no such analysis in the EIS. Yet just a quick sampling of ACRIS data provides at least anecdotal evidence that such speculation is happening. For example 4848 Broadway sold for \$4.4 million in December 2012, and for \$10.35 million less than 5 years later, in March 2017. 100 Cooper Street, a 48-unit building, sold for \$12.9 million in December 2016. And 125 Seaman sold for \$9.5 million in January 2014, and \$15.8 million in August 2015. These prices show that the buyers of these and other buildings believe they can raise rents significantly above what they are now, posing a clear threat of residential displacement to the rent-regulated tenants who make their homes there. A systemic analysis of ACRIS data could help assess displacement risk, but the City did not do so in the EIS.

In fact, of the 12 community board districts with recent or proposed rezonings, CB12 was at the top of the list of displacement risk from rent regulated apartments, according to CITY LIMITS, using data from the Association of Neighborhood and Housing Development (ANHD), citing, for example, the highest number of buildings with five or more complaints filed with HPD (188 buildings), the highest number of buildings with 10 or more new violations issued by HPD in one month (68 buildings), and the highest number of rent-stabilized buildings sold in one month (November 2017): 9 buildings sold for \$75 million.¹² *Do you think those speculators paid \$75 million because they want to keep their profits limited by rent rules?*

So whom do you believe, ACRIS showing speculation in Inwood regulated buildings, CITY LIMITS and ANHD that rate the risk of displacement highest in our community, NYC HRA that provides free legal services because families have serious risks of displacement, or EDC and the Mayor's Office, which says those tenants have no problems so we won't even study the issue?

In Conclusion on Residential Displacement: We're not just considering a technical issue here. We're considering whether the rezoning will cause people to lose their homes. ***Because, on such a vital issue, the City offers no data or analyses to back up their claims, there IS plenty of evidence that displacement risk is extensive and real, and city agencies even contradict themselves, the City Council has no choice but to reject the rezoning proposal, and demand that any future proposal include an environmental review that seriously evaluates direct and indirect residential displacement including displacement from rent-regulated apartments.***

¹¹ Sometimes, as at the City Planning Commission Public Hearing, an official from another part of HPD will report that they do not have preferential rent data any more detailed than the ProPublica zip-code level data as in the notes above. Do not be fooled. HPD's Office of Neighborhood Strategies actually gets detailed preferential rent data from New York State DHCR. HPD must keep tenants' preferential rent data confidential, but can make *analyses* of the data public, as ONS did in the February 2018 CB12 housing committee meeting. Nothing would have kept EDC from asking HPD ONS to do an analysis of preferential rent data for the EIS.

¹² Savitch-Lew, Abigail. "Which Neighborhood Facing Rezoning Faces Steepest Displacement Risks?" in CITY LIMITS, Jan. 11, 2018: <https://citylimits.org/2018/01/11/which-neighborhood-facing-rezoning-faces-steepest-displacement-risks/> This article cites results from using ANHD's data tool to assess displacement in community districts.

Vastly Understated Development Scenario

The City Council cannot trust the City's predictions of how their plan will benefit or harm the community because they have vastly understated the "Development Scenario" which makes virtually all their environmental and social assessments invalid. While many residents are concerned with the City's projection that the rezoning will add 14,000 people to Inwood, they would be shocked if they saw a more realistic scenario which could lead to 18,000 to 28,000 more people instead. I was among a group of experts in our community who submitted comments to the DSOW criticizing the criteria the City used to low-ball the development scenario and specified eight criteria that should be changed or eliminated. (See Attachment A.) As just one of many examples of low-balling: They ruled out redevelopment of many of the one- or two-story commercial buildings upzoned to 11 stories in the Commercial U. The City did not respond on the merits about a single criterion but just cited the *CEQR Technical Manual*. We also asked that the City study actual results of past rezonings compared with the City's projections. The City also said considering the real world impact of past rezonings outside the scope of CEQR. As it was not possible for us to reverse-engineer the City's projections, we asked the City for transparency to supply the reasons sites were chosen or rejected as development sites. The answer was that this was "infeasible,"¹³ despite the fact that EDC's EIS/ULURP consultant has a budget of almost \$900,000.¹⁴ Understating the development scenario can be devastating. Ask Long Island City where the City predicted 300 new apartments but in 14 years 10,000 were built, gentrification ran rampant, and they still have not caught up with school overcrowding.¹⁵ Ask Williamsburg where the City predicted no business displacement, but they lost 75% of their manufacturing jobs.¹⁶

Bottom line: A low-balled development scenario means every environmental and social impact in the EIS is understated: impacts on our infrastructure, our schools, our traffic, our small businesses that will be displaced, our residents who will be displaced, and everything else. ***Therefore the entire EIS is unreliable so you do not have the information you need to decide on this rezoning and must reject the proposal.***

Land Use: Issues with Specific Zoning Districts

We made a presentation to the February 2018 CB12 Land Use committee meeting.¹⁷ Here are some of highlights, with added references to the *Uptown United Platform* alternative plan, the Borough President's recommendation, and Technical Memorandum 001 (A-Text):

- The Commercial U has most of our locally- and immigrant-owned businesses in vital, mixed-use corridors, referred to as "Inwood's Main Street" by Borough President Brewer.¹⁸ Proposed upzoning will enable higher density in 11 to 16 story buildings. Massive redevelopment will ensue, displacing many local businesses and putting about 1,400 existing apartments at risk. We will lose our vital local retail economy that keeps residents' money in Inwood. Instead, chain stores will siphon our spending

¹³ Inwood Rezoning Proposal, Final Statement of Work (FSOW) for the EIS, Appendix 4, pp. 20-22.

¹⁴ Philip Habib & Associates. "Proposal for Environmental Review and ULURP Services," p. 42.

¹⁵ Savitch-Lew, Abigail. "Past Rezonings Shape Long Island City's Feelings About De Blasio Plan" in CITY LIMITS, June 9, 2016 at: <https://citylimits.org/2016/06/09/past-rezonings-shape-long-island-citys-feelings-about-de-blasio-plan/>

¹⁶ Savitch-Lew, Abigail. "Skeptics Say City's Environmental Studies Understate Damage from Development" in CITY LIMITS, Sept. 26, 2016 at: <https://citylimits.org/2016/09/26/skeptics-say-citys-enviro-studies-understate-damage-from-development/>

¹⁷ "Inwood Rezoning: Issues and Alternatives" presented to CB12 Land Use Committee on February 8, 2018 by Graham Ciraulo, Paul Epstein, and David Thom.

¹⁸ Brewer, Gale. "Borough President Recommendations" on Inwood Rezoning ULURP Application, April 26, 2018, p. 23.

away to their national headquarters. The *Uptown United Platform* combines R7A zoning with store front size limitations. That would still enable redevelopment of buildings in these corridors currently below maximum FAR, but would protect and encourage uses by local small businesses.

- Borough President Brewer found 147 businesses (with 617 to 800 employees) in the Commercial U in jeopardy of displacement as they are in “soft sites”: 1- to 2-story buildings¹⁹ upzoned to 11 to 16 stories. Yet the EIS only projects displacement of 26 of these businesses due to its vastly underestimated development scenario. *(See above and Attachment A.)*
- Technical Memorandum 001 (“A-Text”) will make matters even worse by enabling a wider range of commercial uses than now allowed in most of the Commercial U, including explicitly non-local uses, such as large-scale big box stores and large bars and nightclubs, without limitation. *(See Attachment B.)*
- The Upland Wedge rezoning enables 11- to 16-story buildings where many 1- and 2-story commercial buildings and small apartment buildings now exist. This will lead to displacement of businesses and tenants, massing of buildings completely out of context with the rest of that area, and even the possible loss of the Seaman Arch which was not listed or evaluated in the EIS as an historic resource.
- The rezoning would concentrate 25- to 30-story buildings around the perpetually backed-up 207th Street Bridge. These are huge masses compared with Inwood’s norm of buildings of 8 stories or less. A lower massing alternative in the *Uptown United Platform* would still enable affordable housing and waterfront access without creating a negative impact on lower rise surroundings in the rest of Inwood.
- Proposed rezoning would prohibit housing in most of the “tip of Manhattan” in anticipation of future industrial or hospital use. But it would concentrate 21- to 27-story apartment towers in a few areas, creating an ugly contrast with largely empty or lightly-occupied M-zoned spaces. But Columbia has no hospital expansion plans and any other industrial uses are highly speculative and likely to leave the lightly-occupied spaces blighted for years. The *Uptown United Platform* alternative plan would enable the same amount of housing, and even more affordable, by using almost the whole area—all but the waterfront—for housing of a height and density that matches the context of the rest of Inwood.
- In the Upland Core, the rezoning proposal endangers current small buildings people admire that are well below R7 density. The *Uptown United Platform* would protect those buildings that add so much to Inwood’s character with specific lower density-zoned lots as has been done in other rezonings such as the rezoning of Boerum Hill, Brooklyn.
- EDC claims the rezoning proposal balances several objectives but it is really “housing at any cost,” including dense R9 zoning rarely found north of Central Park, and R8 zoning not used north of the GW Bridge. By contrast, the *Uptown United Platform* alternative really is a balanced plan because it emanates from six development principles, keeping them all in balance, keeping Inwood recognizable at its current scale, while still enabling a large amount of new affordable housing.

Because the proposed rezoning is so out-of-scale with Inwood and so unbalanced, when a more balanced, principled alternative is available, the City Council has no option but to reject the EDC plan. When voting against the plan, please ask the City to try again and to draw heavily on the *Uptown United Platform* to create a better plan.

¹⁹ Brewer, Gale. “Borough President Recommendations” on Inwood Rezoning ULURP Application, April 26, 2018, p. 24.

The Contextual Area Must Be Expanded

Probably the one part of the rezoning proposal most liked by most of the engaged Inwood residents is the R7A contextual zoning for the “Upland Core,” except, perhaps for the R7A upzoning west of Dyckman. But protecting most areas north of Dyckman with contextual zoning increases the displacement risk of thousands of tenants to the south of the rezoning area. With the real estate market made hot by rezoning, which is already happening, and the possibility of building tall towers eliminated from the Upland Core north of Dyckman, the pressure will be on South of Dyckman for developers to combine lots and build luxury towers under current zoning. Our neighbors who live there will be at high risk of displacement. In fact, Community Board 12 has specifically asked that the area south of Dyckman be contextually rezoned in the board’s resolution supporting contextual zoning (October 2012, rev. July 2016). And in that zip code there are 3,266 households with preferential rents²⁰—they will especially be at risk.

The contextual rezoning area should also be expanded north to include Columbia’s property to protect the community from Columbia deciding to build non-contextual towers some time in the future. That won’t affect Columbia’s current uses. EDC keeps saying they cannot expand the rezoning area at this time because they’d have to do a new study. But they were asked to do that at least a year ago, months before the environmental review started. The rezoning will affect Inwood for at least 50 years. When will the City study the area south of Dyckman? Ten years from now? Twenty years from now? The current neighborhood there will be gone by then! We don’t care that they’d have to do a new study: They made this terrible mistake, they should do the work over again! ***Because EDC will not do so, you have no choice but to reject the rezoning application.***

Lack of Balance in City Plan: Inwood Asked to Bear at Least 10 Times its Share of Population Growth

EDC often claims it sought “balance” in the Inwood rezoning. But it is clearly far out of balance, focused on adding housing—mostly at market rate—at any cost: the cost to our thriving small businesses, the cost to our lower income residents, the cost to our neighborhood character which will be unrecognizable. Clear evidence of the lack of balance is to compare citywide projected population growth with the projected growth of Inwood. The City population is expected to grow by about 3.3% by 2030 based on City Planning data.²¹ By EDC’s own projections, which we believe are low, Inwood’s population will grow by about 33.5% by 2032.²² As EDC’s development scenario is understated, as we have argued (see above) *and the City has not refuted*, then a more realistic population increase may be more like 50% to 70%. Inwood has some underdeveloped land and can afford to grow somewhat if our infrastructure is fixed first. But if the City’s population will grow by about 3%, why should Inwood be asked to take on 34% to 70% more people? ***That’s a minimum of 10 times our share of the City’s population growth.*** We are not wedded to keeping Inwood’s population growth to only 3%. The United Uptown Platform alternative plan projects a population growth of about 22%,²³ putting great emphasis on adding affordable housing, while keeping more balance than the City’s plan by protecting our small businesses, increasing tenant protection efforts beyond the City’s plan, and keeping our neighborhood character from being extremely

²⁰ See ProPublica (<https://projects.propublica.org/graphics/preferential-rents>) and enter zip code 10040.

²¹ 2016 City Population: 8,537,673 (See <http://www1.nyc.gov/site/planning/data-maps/nyc-population/current-future-populations.page>) and 2030 City Population: 8,821,027 (See Table 1, top of page 3, of: http://www1.nyc.gov/assets/planning/download/pdf/data-maps/nyc-population/projections_report_2010_2040.pdf)

²² Inwood Rezoning Proposal EIS: p. ES-4: 2015 Inwood Population: 42,676; p. ES-35: Projected Rezoning Increase: 14,305.

²³ Based on Uptown United projection of 9,549 more residents, *Uptown United Platform*, p. 4.

distorted.²⁴ As noted above under “Demand a Different Scenario ...” if upzoning for population growth were done more equitably across the city, a small number of neighborhoods, such as Inwood, would not have to bear such a disproportionate share of the city’s growth. ***Because the City’s plan is so unbalanced, and a more balanced alternative is available, you must reject the rezoning proposal.***

EDC’s Commercial Rezoning Risks Subjecting Much of Inwood to Blight and Noise

In presenting its increased commercial zoning with very few restrictions (especially with the A-text), EDC argued that as the retail industry is in flux, they wanted to leave a lot of flexibility so sites can be adapted to whatever trends develop in the future. That may sound good in the abstract, but in reality, this zoning will encourage large retail floorplates for big-box chain stores. And in so doing, runs the risk of leading to the blight of large vacant storefronts, as both the proliferation of chains and the preponderance of large ground floor commercial store plates have been associated with increased vacancy rates.²⁵ The EIS did not study these trends. So EDC, acting in ignorance of available data, has proposed actions that threaten to spread retail blight into Inwood, a neighborhood which is still home to three major thriving retail corridors with a relatively low vacancy rate (below 9%)²⁶ according to the City’s own data.²⁷ It also ignores the likely displacement of current small business tenants by enabling large-scale non-local uses. (See Attachment B.)

EDC has presented no business demand analysis, so we considered what kinds of commercial development are *really* likely to happen in all of Inwood, especially in the Commercial U. Given the wide range of commercial uses EDC would be enabling, which would be most likely or least likely to be developed?

As best we can determine, the amendments in Technical Memorandum 001 (“A-Text”) to enable large, all-commercial buildings with high ceilings, seem to be aimed at encouraging office buildings in the “U.” But where is the demand for large-scale office space in Inwood? What white collar industry is likely to move a critical mass of businesses and employees here? Developing a large-scale white collar presence in Inwood seems especially unrealistic in the short term and highly speculative, at best, in the 15-year development period of the EIS. However, as the rezoning leads to large-scale population growth, mostly at high income levels, it is not speculative to consider that chain stores will follow closely—and some may come sooner in anticipation of the increased customer base. And, as too often happens, some are likely to overestimate the walk-in market for their stores and close early, leaving large, blighted empty storefronts, too big and expensive for Inwood’s small businesses.

But what type of business is likely to come first? Most likely, one with an existing market of customers that new establishments can already tap into, without waiting for the population to grow. Inwood has

²⁴ *Uptown United Platform.*

²⁵ Olivia LaVecchia and Stacy Mitchell, “Testimony by Institute for Local Self-Reliance: Oversight Hearing on Zoning and Incentives for Promoting Retail Diversity and Preserving Neighborhood Character,” § Council Committee on Small Business and Subcommittee on Zoning and Franchises (2016); Brad Hoylman, New York State Senator, “Bleaker on Bleecker: A Snapshot of High Rent Blight in Greenwich Village and Chelsea” (New York State Senate, May 2017); Mary DeStefano, “Final Report: Preserving Retail Diversity in Community Board 3” (New York City: Manhattan CB3, 2012), <http://www.nyc.gov/html/mancb3/downloads/fellowship/Preserving%20Retail%20Diversity%20in%20Community%20Board%203.pdf> The New York City Council, *Planning for Retail Diversity Supporting NYC’s Neighborhood Businesses.*

²⁶ The New York City Council, *Planning for Retail Diversity Supporting NYC’s Neighborhood Businesses.*

²⁷ New York City Department of Small Business Services, “Neighborhood 360: Inwood Manhattan Commercial District Needs Assessment,” 2016, <https://www1.nyc.gov/assets/sbs/downloads/pdf/neighborhoods/n360-cdna-inwood.pdf>

such an industry that attracts numerous out-of-town customers: A loud bar and nightlife scene, currently concentrated in a few locations, but loud enough to generate the greatest number of noise-related 311 complaints in the City and the most NYPD-issued noise summonses in the City. In response to a comment on the DSOW, the City said, “no projected development sites are anticipated to include nightclub uses in the future With-Action condition.”²⁸ But that response is disingenuous. Establishments do not have to be licensed as nightclubs to cause noise problems. Loud bars and restaurants with loud bar scenes often are the cause of noise problems and violations. And, under the originally proposed rezoning, 17 development sites (8 projected, 9 potential) on Dyckman St. and on Broadway from Dyckman to Cumming, the C4-4D and C4-5D zoning would allow nightclubs, including large ones.²⁹ How can the RWCDs possibly anticipate that none of these redeveloped sites will include nightclubs or other noisy bars?

Opportunities for nightclubs increase when considering the A-Text, in which the proposed zoning map and text changes would allow nightclubs, including large ones, *on the entire Commercial U* as well as on Dyckman west of Broadway. And limited building front restrictions in the A-text on parts of 207 St. and Dyckman, purportedly intended to reinforce small scale local retail, in reality do not restrict at all many large-scale, explicitly non-local commercial uses. For example, the wording of the applicable zoning text amendment includes, as an unrestricted use, Use Group 12,³⁰ which “consists primarily of fairly large entertainment facilities that have a wide service area and generate considerable pedestrian, automotive or truck traffic ... [including] eating or drinking establishments with entertainment and a capacity of more than 200 persons, or establishments of any capacity with dancing,”³¹ in other words, large restaurants and bars, and nightclubs of any size.

EDC has offered no plausible commercial development scenario—just that it wants to allow flexibility. I believe the development scenario suggested above *is* plausible: An expanding bar and nightlife scene is likely to extend noise problems to much more of Inwood, with big-box chain retail following soon after, increasing the potential for blighted large storefront vacancies.

The City’s Community Engagement Has Been a Sham

EDC always points to their two years of citizen engagement they say has informed their plan, and they’ve taken attendance at events so they can cite numbers of people who have participated, as if they were allowed to make a difference. But that’s a complete sham. They knew what they wanted to propose long before they released their plans to the community. Then they released their plans piece by piece, telling us each piece was in response to the community or elected officials, as if each piece was new. But just look at their EDC EIS consultant’s January 2016 proposal, in which it is clear that EDC already had the West Dyckman upzoning, part of the upland core, and their Commercial U upzoning in their sights ³² as shown in the map from the proposal on page 14 of this testimony. They did not show those plans to the community until 17 months later, in June 2017. The community response at a CB12 Land Use Committee charrette-style meeting was unanimously against the Upland Core boundaries (saying they should be extended north and south) and the Upzoning of the Commercial U. Upzoning the Commercial U, for

²⁸ Inwood Rezoning Final Statement of Work, Appendix 4, p. 107.

²⁹ From the NYC Zoning Code, C4 districts allow Use Group 12, see 32-21:

<https://www1.nyc.gov/assets/planning/download/pdf/zoning/zoning-text/art03c02.pdf>

³⁰ Technical Memorandum 001 for Inwood Rezoning Proposal, Appendix A, Zoning Text 142-14 and Map 2.

³¹ Zoning Resolution of the City of New York: <https://www1.nyc.gov/assets/planning/download/pdf/zoning/zoning-text/art03c02.pdf>

³² Philip Habib & Associates. “Proposal for Environmental Review and ULURP Services,” pp. 5, 9 (map on p. 9)

example, puts at risk most of our locally-owned small businesses and puts a dagger in the heart of our immigrant-based local economy. But did they come back to community groups to try to understand our objections and collaborate on a creative compromise? No. With no further engagement, one month later they locked that plan in place and said that's what's going to EIS and ULURP, and that was that.

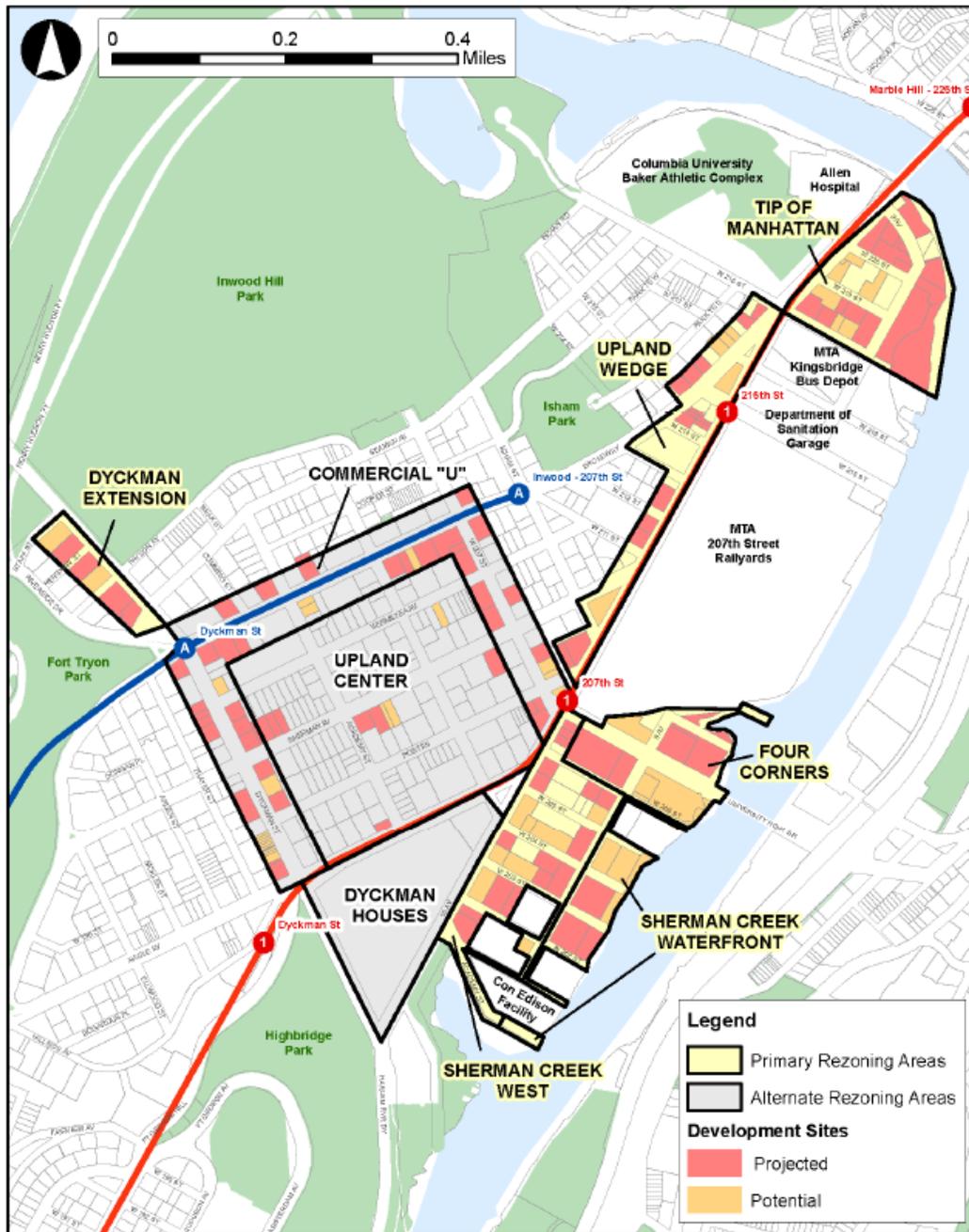
But it's worse than that. The basic underlying plan of massive upzoning along the Harlem River and in the Commercial U was actually a Bloomberg plan developed by the Department of City Planning in 2006, as revealed in an article in THE REAL DEAL's November 2016 issue.³³ The author of the article is Adam Meagher, then working for DCP, and now the very EDC Vice President leading the Inwood NYC Plan.

EDC was just as disingenuous with the zoning amendments to the Commercial U in the A-text. The overall Technical Memorandum does have a few features that responded to community concerns (e.g., finding a place for some of Inwood's wholesalers). But who asked for rezoning the *entire* Commercial U to fully commercial C4-4D and C4-5D? Certainly not Inwood's thriving small businesses that already felt threatened by the original proposal for the "U," and that are even more threatened by the A-text. The Technical Memorandum suggests this is in response to feedback from the council member. But in reality, EDC was considering C4-4D/C4-5D zoning much earlier, and were just waiting for an excuse to sneak it in. Back in the June 2017 CB12 Land Use charrette, EDC had given participants at each table choices of zoning to consider for the parts of the Commercial U: R7A, R7D, or R8A (all "Rs" with commercial overlays) or C4-4D and C4-5D. No tables—not one—chose C4-4D/C4-5D. So EDC staff did not include it in its original proposal. They knew they'd get enough negative reaction from their R7D/R8A upzoning proposal; they did not need to antagonize residents and business owners further. But only *after* CB12 engaged residents (more genuinely than EDC did) and voted on EDC's ULURP application did EDC reveal their true intentions, and proposed amendments sneaking in C4-4D/C4-5D, complete with a deceptive text amendment that permits unrestricted large-scale non-local uses. (*See Attachment B.*)

All of EDC's talk of community engagement was phony. Instead of making any attempts to collaborate with the community they approached engagement as a power play: EDC controlled the information flow and the community had to react, then react again, and again. And in the end, the community was not allowed to make any difference that mattered. Real engagement that gave the community any voice was never the point. It was all a sham. ***Because EDC totally disrespected the community, the City Council has no choice but to reject EDC's plan, and tell them to come back when they're ready to collaborate with us.***

³³ "Massive Inwood parcel set for high-rise, waterfront housing" in *The Real Deal*, Nov. 2016 issue, posted online Oct. 29, 2007: https://therealdeal.com/issues_articles/massive-inwood-parcel-set-for-high-rise-waterfront-housing/

January 2016 Map Laying Out Inwood Districts for Rezoning³²



Need a Commitment to Dynamic Action Against Displacement Risk with Periodic Measurement & Reporting

Any rezoning action should include an ironclad commitment from the City, with adequate funding, to:

- Provide frequent measurement and transparent public reporting of indicators related to displacement or displacement risk, such as indicators of apartments that drop out of regulation, housing cost burden, low income tenants who vacate apartments, median rent levels of regulated apartments, commercial rent levels, businesses that close or leave Inwood, and other indicators. Commit that when these indicators move in the wrong direction, the City will increase resources and aggressive

action for enforcement, legal assistance, and other interventions to greatly reduce displacement and displacement risk.

- Monitor vacancies of specific regulated apartments by low income families and assure that landlords rent those apartments to new low income families with the same income status as those who vacated, by whatever enforcement mechanisms or other methods needed.
- Monitor businesses forced to move or close due to redevelopment or rising rents, and provide assistance to help keep small businesses in Inwood and protections against further displacement.
- Monitor and transparently report the overall income distribution of families in regulated apartments and intervene with investments, enforcement, or other mechanisms as needed over time to achieve a targeted affordability distribution based on Inwood's actual income distribution, as specified in the "Uptown United Platform" alternative plan.

Without a commitment to dynamic measurement and action against displacement over time, and for the long term, the City will be leaving too many people unprotected from future housing insecurity. ***So without that commitment, you should reject the City's application.***

Underground Infrastructure Risks, Especially for Energy

Our electrical distribution system depends on 90-year old cables, some with paper insulation, and old, over-used transformers, leading to underground fires and occasional blackouts and brownouts in parts of Inwood even with our current population. The gas distribution system is similarly antiquated. Yet the EIS only considered energy generation and transmission capacity. However, in Inwood the problems are in the energy distribution systems, not generation or transmission. For example, on Friday, March 23, 2018, there was yet another underground electrical fire in Inwood, this one caused by a transformer that exploded under Cooper Street just north of 207 Street. Luckily, the Fire Department arrived in time to break holes in the basement walls of a building to enable dangerous fumes to escape before they caused a building collapse or spread poisonous gas to people's apartments. We will undoubtedly have more close calls like this with a large population increase putting proportionally bigger loads on the system, and perhaps some won't be "close calls" but will result in injury or death in addition to the property damage that already occurs from these incidents. Con Ed has presented to CB12 and the CPC that they have Inwood's energy infrastructure under control and can handle increased demand, but the record of the last 20 years calls this into question. For example:

- The 1999 Attorney General's Staff Report, Queens Task Force, addressed the need for Con Ed to upgrade its Washington Heights/Inwood network infrastructure. This report indicated that gas and electrical distribution systems that interconnect with the Bronx and Queens are antiquated and failing.
- The Attorney General's assessment was supported by: the Con Ed Corporate Review Team, an independent Blue Ribbon Panel of Electrical Industry Experts; a New York State Assembly Task Force; and a Power Outage Task Force.
- In addition, the Public Service Commission (PSC) took rare action against Con Ed, stating that Con Ed did not act in a timely manner on the 46 recommendations made by the Department of Public Services Engineering Staff regarding necessary upgrades in the Washington Heights/Inwood network.
- During PSC Administrative Hearings on January 23, 2007, Con Ed engineers testified it is undisputed the blackouts occurring in Washington Heights and Inwood in 1999, 2003, and 2006 were due to the antiquated distribution systems in our network. Because of network interconnections, the 2006 blackout in Upper Manhattan also affected northwest Queens.

- The PSC took action against Con Ed because of the lack of progress in Upper Manhattan’s network of gas and electricity infrastructure. Both systems are still antiquated. As of 2014 Con Ed was still telling elected officials that it could take another six years to upgrade how it brings gas to the community, and to serve the whole community.
- Community institutions such as Yeshiva University and Isabella Geriatric Center have been told that it would cost in excess of 3 million dollars for Con Ed to run a gas main and to connect it to their facilities. Both institutions, already dealing with financial challenges, will have to put expansion plans on hold. Meanwhile, Isabella has had to close its laundry service which has cost much needed jobs in the neighborhood. Yeshiva is reassessing its expansion plans.
- As of 2014, the Washington Heights/Inwood network remained the most antiquated in Manhattan.

These situations show that the state of the subsurface gas and electrical distribution infrastructure in Northern Manhattan is woefully inadequate. You must not rely on mere assurances from Con Ed. Instead, City Council should require hard data from Con Ed verifying that long-needed gas and electric distribution networks have been upgraded and made robust enough to support an increased population of at least 20,000. ***Because these serious and dangerous problems are ignored, you must reject EDC’s plan, and tell the City that no rezoning should be allowed until after our infrastructure is fixed first, especially our underground energy infrastructure.***

Separate ULURP for the Library and Only Once Alternate Site and Service Plans Are Identified

There are reasonable concerns about the library project, such as why the library space is not being increased (or at most increased only modestly) when Inwood’s population is projected to increase by at least 34%. However, what is this project really? So far, it’s been presented only in conceptual terms and preliminary renderings, which is one of the concerns I have; that I think you should have, too.

- Community boards, borough presidents, and the City Council usually get to consider disposition of City land and a valuable community asset as its own, standalone ULURP process. It is unfair and frankly disrespectful to our public officials and the community to combine the library ULURP with the rezoning ULURP. Because they all end up with just a limited amount of time to consider all the complexities of rezoning—the R7s, R8s, R9s, special sub-districts with lots of fine print, potential impacts on residents and businesses, and on and on. And, at the same time, to evaluate the disposition of the library and the City land below it.
- Also, usually for disposition of public assets, you don’t just get asked to approve the project in concept, but you get the full design to consider and request changes. HPD did rush forward with a developer and conceptual renderings *after* CB12 was required to issue its resolution on the rezoning, giving them no time to negotiate over details, so they did not support the actions required for the library project. As Council Member, you have a little more information about the project than CB12 had, but not enough for a considered opinion. And, of course, you’ll still have to consider all the larger Inwood zoning issues, too. It is unfair and disrespectful to the community to force consideration of this complex project into the same ULURP process as an even more complex rezoning.
- The closest other project in the city to the Inwood Library is the Sunset Park Library, also involving a new library with affordable housing on top. Consider that the biggest fear in Inwood about the library proposal is whether the temporary library and all interim library services will be adequate. In Sunset Park, the developer and the Brooklyn Public Library promised not to go to ULURP until an alternate

site was identified, and they kept that promise. Why can't Inwood be shown the same respect as Sunset Park?

Because the City is forcing the community to consider disposition of important community assets at the same time as a complex rezoning, and not identifying an alternative site and services as was done in Sunset Park, you should reject all actions related to the library project and tell HPD to try again with a separate ULURP application.

Inwood Has Only Been Getting “Crumbs” In Investment, but No Investment Will Compensate for the Damage the City’s Proposed Rezoning Will Cause

Almost all of the \$31 million plus that the City claims it is already investing in Inwood have nothing to do with rezoning. Almost all of it, \$30 million, is an Anchor Parks initiative for renovating parts of Highbridge Park, which is not even in Inwood and does not even border the rezoning area. Yes, our friends in Washington Heights deserve that investment, but why not make major capital investments in improving Inwood’s own vast parkland, our biggest natural resource? Considering the vast size of Inwood’s parks, providing only \$150,000 in grants for short-term improvements and events in them is an insult. EDC even has the audacity to cite rehabbing the Inwood Hill Park Nature Center as an investment tied to rezoning, but that again has nothing to do with rezoning or City investment; that’s paid for by federal FEMA funds owed to us since Hurricane Sandy in 2012. Similarly, the Broadway bridge repair is a regular DOT capital project, not a rezoning investment. Yes, we appreciate the relatively modest investment made to open a special legal assistance office in Inwood, but by a few months after they were open their attorneys’ caseloads were full. That office is not big enough to handle current harassment and displacement pressures, let alone the surge in cases sure to come with rezoning. Of course there will be negotiations on investments for Inwood as the rezoning application proceeds. So what EDC and other agencies have done is set the bar very low, giving us crumbs to start out so any future commitments will seem large by comparison. The community won’t fall for this negotiating ruse and neither should the City Council. Inwood needs large-scale investments in infrastructure improvements by the City and private utilities (e.g., Con Ed), new schools and upgraded school facilities, and much more. And any rezoning that will increase the population significantly will lead to a need for even more investment. Also, EDC’s rezoning proposal does not provide a basis for negotiation because it is so flawed, as outlined in arguments above, that even large-scale investments will not make up for the damage that will be done. Therefore it is essential to have a much better plan as the basis for negotiating commitments, and one exists, the *Uptown United Platform*. So, the City Council is much more likely to help us get better, more valuable investments for the community if you ***reject the City’s rezoning proposal and recommend using the Uptown United Platform as a basis for negotiating investment commitments.***

ATTACHMENT A to Paul Epstein's City Council Testimony: Development Scenario Issues in the EIS

Overly Restrictive Development Criteria that Should be Eliminated or Changed

Source: Pages 10-11 of "Unified Inwood Comments" on Inwood Rezoning Draft Statement of Work (DSOW) with *examples* added here to illustrate most comments. Note that the examples are meant to be illustrative only, and do not represent all possible cases. The City's response to these comments in the Final Statement of Work (FSOW) did not address a single criterion on the merits, but referred to the *CEQR Technical Manual* and professional judgment and past experience of EDC and DCP.

"Underutilized lots" to be included as development sites are "defined as vacant or lots constructed to less than or equal to half of the proposed FAR under the proposed zoning."

- This criterion uses surgical precision to eliminate many likely development sites in Inwood. It eliminates sites with less than 50% FAR available to be built, an arbitrary cutoff. This misses upzoning of *two full zoning increments*, from R7-2 to R8A, even though R8A's FAR is 80% greater than R7-2's.
 - A fully built-out R7-2 lot would be eliminated because it would have 44% added FAR available when upzoned to R8A, even though it could be replaced by a 14-story building with excellent views on half its floors that could command very high market rate rents.
- This criterion also eliminates built-out and mostly built-out R7-2 buildings upzoned one increment to R7D, even though R7D's FAR is 40% greater than R7-2's.
 - R7D lots allow 11 story buildings with good views that could command high rents on upper floors, so it is likely that even some mostly-built out R7-2 sites would be redeveloped in R7D districts if the added square footage is high enough.
 - There are buildings in the "Commercial U" ruled out by this criterion that could get from 10,000 to 115,000 extra square feet of residential development space from their current as-built status.
- The "underutilized lots" definition should be changed to "vacant or lots constructed to less than or equal to 70% of the proposed FAR under the proposed zoning" to capture the R7-2 to R8A increase in full, and to capture most partly built-out buildings that would be rezoned from R7-2 to R7D.
- *Examples: Most of the fully or mostly built-out lots in the "Commercial U." Of all these buildings, some are bound to be redeveloped when the allowable FAR becomes 40% to 80% greater than it is now.*

Exclusion of "sites where construction and/or renovation activity is actively occurring or has recently been completed"

- This makes no sense as a general rule. A recent renovation will not matter if there is a large enough gain in FAR for a developer to increase future profits. For example, a freshly renovated two story building is still getting bulldozed within 15 years if its block is rezoned to 11 stories!
- This criterion should be dropped.
- *Examples: Borough President Brewer described, in her ULURP Recommendation, that there are 147 businesses in one- and two-story buildings in the "Commercial U," yet most of these were not included in the RWCDs as projected development sites. Some examples (of many):*
 - *120-128 Dyckman is a series of 2-story shops not included as even a potential development site though rezoning will allow 11 stories.*
 - *Duane-Reade at 133-141 Dyckman: 1 story building and parking lot, though newly built, would be allowed 11 stories with ground floor commercial space and up to 10 floors of apartments. It is hard to imagine it won't be redeveloped by 2032.*

Exclusion of "sites with institutional uses, active and continuing through the build year, e.g., schools (public and private) and houses of worship, unless there are known development plans."

- Any institution in Inwood may change over 15 years. For example, some churches, because of shrinking congregations or funding, try to sell or redevelop parts of their property. Holy Trinity in Inwood has been discussing redevelopment for a while.
- This criterion should be dropped, or changed to be much more selective.
- *Examples: Holy Trinity is no longer just "discussing" redevelopment. Their Diocese (or its real estate consultant) issued an RFP for developer proposals for part of their land. Also, St. Jude and Manhattan Bible Study Church have developable land cited by Congressman Espaillat as sites for affordable housing.*

Exclusion of "Sites containing government-owned properties, since the development and/or sale of these lots may require additional discretionary actions from the pertinent government agency or the elimination of essential uses that cannot be relocated effectively."

- The criterion has already been broken by the "Inwood NYC Action Plan" the rezoning is based on, which includes redevelopment of the Inwood Public Library on City-owned land. Who is to say other developments on public property will not happen if rezoning enables it? How can the DSOW preparers brazenly use a criterion the City has already broken?
- After we pointed this out in response to the DSOW, the City updated its criterion to start "Except for the Inwood Branch Library," which is an admission of the weakness of this criterion. If the library can be redeveloped, so can other government-owned properties over a 15-year period.
- This criterion should be dropped or made much more selective.
- *Example: Council Member Rodriguez has expressed to residents his vision of developing the lightly-used track behind the library to an immigrant center and affordable housing, with a new track on the roof.*
- *Examples: Borough President Brewer cited, in her ULURP Recommendation, a City-owned DOT lot at Sherman Creek between 205 & 206 Streets (Block 2186, Lot 9), City-owned land in the "Tip of Manhattan" (Block 2197, Lot 75), and a federally-owned site at 5051 Broadway. U.S. Representative Espaillat similarly cited a range of government-owned sites.*

Exclusion of "Sites crucial to the daily operations of utility companies."

- This criterion is too broad and does not account for recent rapid changes in industries that have been considered "utilities." In Inwood, this particularly applies to the Charter Communications site. If that site is rezoned to allow a residential tower up to 26 stories, a developer will offer them plenty and Charter will happily take the money and move.
- This criterion should be dropped, or changed to be much more selective, with at least the Charter Communications site included as a development site as well as one or more of Con Edison's sites.
- *Example: As noted above, Charter Communications site and the site Con Edison had pledged to sell for housing in a Memorandum of Understanding with the City. Congressman Espaillat has included Charter Communications and Con Edison sites in his tour of likely sites for affordable housing.*

Exclusion of "Multi-story, multi-unit residential buildings with existing rent-stabilized tenants (such buildings are unlikely to be redeveloped because of the required relocation of tenants in rent-stabilized units)."

- This criterion may have some basis in rent regulation rules, but it has no basis in reality. Just consider the frequent stories of tenants being bought out or pushed out through harassment. And consider that about 30% of Inwood regulated apartments are leased for preferential rents that can be quickly raised to much higher levels, also forcing people out.

- Borough President Brewer cited that the EIS “improperly” relied on the *CEQR Technical Manual* to exclude any analysis of potential impact of rezoning on residents living in rent-regulated housing. If rent regulated tenants are at risk, their buildings are candidates for development.
- This criterion should be dropped or made much more selective. For example, City agencies (DOF and HPD) have access to data on numbers of regulated apartments in buildings, changes in those numbers, and numbers of tenants with preferential rents. These data could be used to determine buildings with rent-regulated tenants that pass other screens that are close enough to becoming completely deregulated, or that have few enough tenants to be worth the extra costs to buy out or relocate remaining tenants, to consider these buildings likely to be developed within 15 years. If some of these data (e.g., HPD’s on preferential rents that come from State DHCR) are not public, the Mayor’s Office can ask the other agencies to do parts of this analysis for the EIS. If the City is unwilling to do this extra analysis, then *all* buildings with rent-regulated tenants that pass other screens should be considered projected development sites.
- *Example: Of all 12 community districts with neighborhood rezonings considered or recently passed, CB12 has the highest risk of displacement from rent regulated apartments, according to ANHD’s displacement risk data tool, with 9 rent-stabilized buildings sold to speculators for \$75 million in November 2017 alone.*³⁴

Exclusion of “Sites generally smaller than 7,500 sf occupied by existing residential development.”

- This criterion is wrong. These sites can be developed easily, especially when spurred by rezoning.
- This criterion should be dropped.
- *Example: 68 Cooper Street, a 5,000 sf undeveloped lot, has been put on the market for \$4 million with the anticipated rezoning featured prominently in the sales material.*³⁵

Exclusion of “Sites with a significant number of commercial and residential tenants.”

- This criterion is wrong. Developers can easily buy out these tenants and will do so with rezoning that offers substantial profits. An important commercial tenant has even told us about a provision in his lease that allows the landlord to terminate the lease if the property owner decided to rebuild. Such a “demolition clause” is not uncommon in commercial leases. That tenant, and others with similar lease provisions, will be easily removed if the rezoning offers profits to developers to build bigger, more lucrative buildings on those sites.
- This criterion should be dropped.
- *Example: C-Town on Broadway just south of W. 207 Street. Unified Inwood comments also asked the City to identify the number of businesses with such “ROFO” clauses and assess the impact of rezoning on them. The City’s response was that this was “outside the scope of CEQR.”*

NOTE: Other “Unified Inwood” Comments on the Inwood Rezoning DSOW also referred to all “soft site” selection criteria generally, including other criteria that seemed arbitrary, and requested studies of comparisons of actual vs. projected development in other rezonings, and for specific reasons why each site was selected or rejected as a development site. The City’s responses in the FSOW were that studies of the reality of other neighborhood rezonings are “outside the scope of CEQR” and that providing the reasons sites were included or selected or rejected was “infeasible.”

³⁴ Savitch-Lew, Abigail. “Which Neighborhood Facing Rezoning Faces Steepest Displacement Risks?” in CITY LIMITS, Jan. 11, 2018: <https://citylimits.org/2018/01/11/which-neighborhood-facing-rezoning-faces-steepest-displacement-risks/> “ANHD” is the Association for Neighborhood and Housing Development.

³⁵ Exclusive Offering Memorandum: <https://www.easternconsolidated.com/media/properties/docs/9cb93f5efcf5f069a25e/68CooperStreetM.pdf>

ATTACHMENT B to Paul Epstein’s City Council Testimony:

Commercial Upzoning & Related Technical Memorandum

Borough President Brewer eloquently referred to the “Commercial U” (Dyckman St., Broadway, and 207 St.) as Inwood’s Main Street with important economic and social uses and meaning for Inwood residents and workers, especially Inwood’s many immigrants. Her staff’s recent canvassing of the “U” found that 147 businesses—almost half of the businesses in the “U,” with 617 to 800 employees, are in 1- to 2-story “soft sites.”³⁶ A September canvassing of the Commercial U by a team of CUNY students found a similar result. They also found that the overwhelming majority (80%) of the businesses are independent, family-owned businesses. As Broadway and 207 Street are currently zoned residential with commercial overlays, these are vital, mixed-use corridors. Proposed upzoning will enable higher density in the “U” of 11 to 16 story buildings. Massive redevelopment will ensue, displacing many local businesses and putting about 1,400 existing apartments at risk. We will lose our vital local retail economy that keeps residents’ money in Inwood. Instead, chain stores will siphon our spending away to their national headquarters. The Uptown United Platform combines R7A zoning with store front size limitations. That would still enable redevelopment of buildings in these corridors currently below maximum FAR, but would protect and encourage uses by local small businesses. While the current R7-2 zoning and the Uptown United Platform’s R7A would still leave current 1- and 2-story sites open to development, the changes would happen much more gradually and “naturally” than with the proposed upzoning, making it more likely Inwood will keep the local, independent character of its “Main Street.”

The originally proposed upzoning for the Commercial U would be destructive of Inwood’s local economy, and should be rejected. But the further changes to the Commercial U, as well as to Dyckman Street west of Broadway, proposed in the “Technical Memorandum” would be even worse, for these reasons:

- Changing the zoning designations of Broadway and 207 Street from residential with commercial overlays to fully commercial will allow a much wider range of commercial uses than now allowed on those streets, inconsistent with the neighborhood “Main Street” local small business character of those corridors.
- The Technical Memorandum describes storefront restrictions on 207 St. and Dyckman east of Broadway to preserve small businesses, but the actual zoning text amendment³⁷ for this provision renders these protections meaningless by not restricting many non-local uses, enabling a wide range of “big-box” chain stores and other non-local uses, including large bars and nightclubs, in the whole “Commercial U” and other sub-districts, including, e.g.:
 - *Use Group 10* consists primarily of large retail establishments (such as department stores) that: (1) serve a wide area, ranging from a community to the whole metropolitan area, and are, therefore, appropriate in secondary, major or central shopping areas; and (2) are not appropriate in local shopping or local service areas because of the generation of considerable pedestrian, automobile or truck traffic.³⁸
 - *Use Group 12* is also explicitly non-local, including non-local venues expected to bring in outside traffic such as large-scale bars and restaurants with entertainment and dancing.³⁷
- *We asked EDC if our interpretation of the zoning text is correct. They confirmed we are correct.*³⁹
- And these very weak restrictions do not even apply to Broadway or Dyckman west of Broadway.⁴⁰

³⁶ Brewer, Gale. “Borough President Recommendation” on Inwood Rezoning ULURP Application, April 26, 2018, pp. 23-24.

³⁷ Technical Memorandum 001 for Inwood Rezoning Proposal, Appendix A, Zoning Text 142-14 and Map 2.

³⁸ Zoning Resolution of the City of New York: <https://www1.nyc.gov/assets/planning/download/pdf/zoning/zoning-text/art03c02.pdf>

³⁹ E-mail of Adam Meagher of EDC to Paul Epstein of May 7, 2018, in reply to Epstein’s May 2, 2018 e-mail. We will provide this upon request.

⁴⁰ Technical Memorandum 001 for Inwood Rezoning Proposal, Appendix A, Zoning Text 142-14 and Map 2.

- Enabling commercial buildings in the “U” and other sub-districts to have higher ceilings for the same FAR on commercial sites is another invitation for large big box chain retailers to come to Inwood and displace local small businesses, as most small businesses do not need the extra height but most big box chains do.
- The mechanism used to allow commercial buildings added height is to provide the MIH contextual height bonus to development of fully-commercial buildings with no housing. This would seem to subvert MIH which was created as a mechanism to ensure developers produce affordable housing.⁴¹

Alternative Zoning and Policies for the Commercial U and Other Inwood Commercial Subdistricts

Consistent with the Uptown United Platform, zoning on Broadway and 207 St. should be contextual mixed-use (R7A) with a commercial overlay and Dyckman east of Broadway should be C2-6A⁴² with a Special Enhanced Commercial district similar to the Upper West Side. Formula store conditional use authorizations should be included as in San Francisco, intended to keep costs affordable for local independent retailers.⁴³ Inwood should be seen as a prime candidate for at least a pilot implementation of the San Francisco model because of the still existing vibrant small business and entrepreneurial culture uptown.

The CB12 Resolution and Manhattan Borough President Recommendation on the Inwood Rezoning Proposal proposed smart small business-friendly policies, many of which are consistent with the City Council’s “Planning for Retail Diversity” report⁴⁴ and the Uptown United Platform⁴⁵, including:

- Restrict store sizes (CB12: to 3,000 square feet, except supermarkets) and store frontages to create space for small businesses, as in the Upper West Side Enhanced Commercial District.
- Require a "Conditional Use Application" that requires a DCP public hearing for any chain store (formula retail use) that seeks to open in a rezoned area;
- Enact anti-harassment policies and penalties to protect small business owners;
- Allocate a percentage of all new retail space in buildings developed on city-owned land or with city subsidies or other financing to current small business lease holders who are displaced due to landlords exercising demolition and new construction lease clauses;
- Give priority to small business enterprises for new ground-floor retail space created in new residential and commercial developments;
- Hold real estate taxes for properties within the rezoning area at current levels for three to five years after enacting the Proposed Actions to allow commercial landlords and tenants time to assess the impacts of the rezoning;
- Aggressively deploy SBS programs and services to local small business owners to make them aware of available programs and services and to facilitate businesses accessing these programs and services.

In addition to the above, the zoning text should:

- Restrict Supermarket sizes to 15,000 square feet to sustain a varied offering of products that responds to the socioeconomic demographic diversity in the neighborhood.

⁴¹ Technical Memorandum 001 for Inwood Rezoning Proposal, p. 4 and Appendix A, Zoning Text 142-49 and Map 1.

⁴² “Uptown United Platform,” 2018, pp. 5-6.

⁴³ San Francisco Planning Department, *San Francisco Formula Retail Economic Analysis*, 2014, http://www.sf-planning.org/ftp/files/legislative_changes/form_retail/Final_Formula_Retail_Report_06-06-14.pdf/

⁴⁴ The New York City Council, “Planning for Retail Diversity,” 2017.

⁴⁵ “Uptown United Platform,” 2018, pp.10-12.

Attachment C to Epstein Testimony to City Council

Uptown United Platform

Last updated 13 June 2018

Table of Contents

[I. Introduction](#)

[II. Summary of Recommendations](#)

[III. New York City's "Inwood NYC": More Harm than Good](#)

[IV. Uptown United's Plan](#)

[A. A rezoning about us, with us, for us](#)

[B. Preserve existing housing](#)

[C. Create truly affordable, community-controlled housing](#)

[D. Protect and sustain small businesses](#)

[E. Fortify and green our infrastructure](#)

[F. Respect the Community](#)

[V. Conclusion](#)

I. Introduction

OUR COMMUNITY

We live in Inwood and Washington Heights, a working- and middle-class, largely Dominican and Spanish-speaking, residential community in New York City, rich in indigenous Lenape history, where small businesses and a longstanding artistic community thrive. Surrounded by forest, caves, salt marshes, and parks, Northern Manhattan stands out among Manhattan and greater New York City neighborhoods for its natural and demographic diversity. Our community deserves the preservation of existing housing, equitable development of truly affordable new housing, protection for small businesses, continued and robust access to city services, and stewardship of our natural environment through thoughtful and innovative rezoning that respects and responds to local needs and advice.

CURRENT CHALLENGES

Our housing, the largest concentration of rent-regulated apartments in Manhattan, faces pressure from speculators purchasing investment properties and developers seeking to build taller, as-of-right market-rate buildings. Small businesses integral to our community are set to receive no protections from rent hikes, which will drive them out and make room for higher-paying chain stores. Overburdened schools, crowded public transit, and crumbling subsurface infrastructure cannot handle any population increase without immediate renovation and expansion.

WHO WE ARE

Uptown United is a shared platform to propose an alternative vision for our community. We are a collaboration of Northern Manhattan Is Not For Sale (NMN4S), Inwood Preservation (IP), Inwood Small Business Coalition / Coalición de Pequeñas Empresas de Inwood (ISBC/CPEI), Save Inwood Library (SIL), and concerned residents. Our mission is to preserve and protect the character and cultural identity of the Inwood neighborhood in Upper Manhattan: the strong, family-oriented and majority-Latino community; the low-income, predominantly mid-rise housing; the small, locally-owned businesses that serve the needs of Inwood residents; the public assets and historic resources; and large public parks and waterfront. We maintain that any new development must help solve our current challenges rather than exacerbate them. We also hope the Uptown United platform sets a precedent for truly collaborative community-driven planning, not just in Inwood, but in all Northern Manhattan neighborhoods that face many of the same issues as Inwood.

II. Summary of Recommendations

In this Uptown United platform, we make concrete recommendations under six principles of development:

A. A rezoning about us, with us, for us

- All housing built on upzoned land must be made 100% affordable for our community
- Broadly apply contextual R7A residential and C2-6A mixed-use commercial zoning that extends to Inwood's actual southern borders of Hillside Avenue
- Separate the ULURPs for Inwood Library and larger neighborhood rezoning
- Provide contextual R5 zoning to protect small apartment buildings from market pressures of R7A
- Sensitively and sensibly rezone Inwood's choke points at the Tip of Manhattan, the 207th Street Bridge, and the Dyckman-Riverside triangle using a strategic and contextual mix of R7A, C2-6A, and M1-4/R6B to maximize housing while minimizing adverse traffic increases
- Increase density with R7X east of 10th Avenue and south of 206th Street only if 100% affordable

B. Preserve existing housing

- Purchase distressed and at-risk buildings to convert them to 100% permanently affordable units
- Provide tenants and housing activists with rental histories of units from 155th Street northward
- Extend funding for legal services and tenant organizing to all of Inwood, Washington Heights, and Marble Hill/Kingsbridge that covers all rent-burdened tenants, regardless of income or language
- Put political might behind strengthening the rent laws at the state level
- Immediately apply the Right to Counsel and the Certification of No Harassment

C. Create truly-affordable, community-controlled housing

- Adopt affordability numbers for development on all upzoned land that offer an income distribution that matches the neighborhood distribution and an average income that meets the neighborhood average of \$41,687, or 48% of AMI
- Fund these affordability levels through an innovative new term sheet piloted in Inwood
- Build 100% affordable, community-controlled housing on public land, including the ConEd site on the Harlem River, through Community Land Trusts and non-profit developers

D. Sustain and grow small businesses

- Create special districts to preserve immigrant- and women-owned small businesses in "Commercial U" and wholesalers/auto industry east of 10th Avenue
- Institute anti-harassment penalties to protect small business-owners from predatory landlords
- Provide relocation assistance for businesses wanting to remain in Inwood during construction
- Implement policy changes included in City Council's recent [Planning for Retail Diversity report](#)

E. Fortify and green our infrastructure

- Increase school capacity and bolster other municipal services
- Improve transit reliability and frequency
- Repair and fortify subsurface infrastructure including gas, electric, water, and sewer lines
- Install flood buffers in East Inwood through 40-foot-wide parkland along the Harlem River
- Complete the greenway system
- Require LEED standards and solar roofs in new construction
- Pilot organics management in the old Inwood incinerator

F. Respect the community

- Mandate construction jobs and management training be made available to Inwood residents
- Engage people from across the community in collaborative, deliberative planning and problem-solving, and use their ideas to improve Inwood

III. New York City’s “Inwood NYC”: More Harm than Good

The “Inwood NYC” plan, an initiative of the New York City Economic Development Corporation (NYC EDC), proposes a rezoning that does not address our community’s needs. “Inwood NYC” is a plan for hyper-gentrification that would have long-term destructive impacts on our neighborhood. Here we summarize our concerns with the Draft Environmental Impact Statement (DEIS) and Final Scope of Work (FSOW):

- The DEIS low-balls its development scenario to project a population increase of only 14,000 new residents, still a roughly 40% increase. The City’s proposed rezoning actually enables development of housing for up to 46,000 people, but the DEIS maintains that only 36% of the upzoned development capacity will come to pass by 2032 by using flawed criteria. One of many examples: they ruled out redevelopment of some one- or two-story “taxpayers” upzoned to 11 stories. This low-balled number means nearly all environmental and social assessments are understated, and the entire DEIS is unreliable and not useful for decision making by the community or public officials.
- The City’s conclusion in the DEIS that there will be no significant residential displacement is arbitrary and capricious because the City never studied the risk of tenant displacement in the large number of rent-regulated apartments in Inwood and surrounding neighborhoods, notably the 9,200 tenants with preferential rent leases who are especially at risk. Instead, the DEIS arbitrarily follows the *CEQR Technical Manual* to exclude such buildings from the displacement analysis, refusing to consider the characteristics and risks of housing in Northern Manhattan.
- The DEIS claims that no adverse public health outcomes will arise from the proposed rezoning and subsequent displacement. Meanwhile, academics and policy-makers alike agree on the adverse public health outcomes of housing insecurity including rising rents and displacement.¹
- The overwhelming majority of new housing constructed will be market rate and the small amount of “affordable” housing will be out of reach to the majority of people in our community. Mandatory Inclusionary Housing (MIH) without further affordability mechanisms will underwrite the increasing inequality we see all over New York City.
- Vast small business displacement will occur from the proposed upzoning of major commercial corridors. This upzoning will increase property values and continue the trend of rising rents on existing small businesses—these local businesses receive no protections from rent hikes and big-box stores in the current plan.
- The DEIS ignores the severe infrastructure challenges facing Inwood. Schools and transit are already overburdened; increased traffic would delay police, fire, and EMS response; and much of the subsurface infrastructure dates back 80–100 years, with insufficient capacity for such growth.
- There are no guarantees that jobs created by “Inwood NYC” will go to members of our community, despite the precedent for local hire and pre-apprenticeship programs and support for these programs from the Building Trades unions.
- In creating “Inwood NYC,” EDC has not respected the community, instead imposing a top-down plan, created prior to community input, based on a map not shared with the community until there was little chance to make a difference. In writing its DEIS, the City repeatedly ignored requests by many respondents for specific studies of environmental, infrastructure, public services, and social impacts, saying either that these issues were out of scope or that the *CEQR Technical Manual* does not require them. These non-responses are all the more frustrating because NYC EDC’s consultant for EIS and ULURP has a budget of nearly \$900,000.

¹ See, for example: Fullilove, Mindy T. *Root Shock: How Tearing Up City Neighborhoods Hurts America*. New York: New Village Press 2016 [2004]; Cohen, Rick. [“Confronting the Health Impacts of Gentrification and Displacement”](#) in *Nonprofit Quarterly*. 11 Apr 2014; [“Housing Insecurity and the Association With Health Outcomes and Unhealthy Behaviors”](#) in CDC Research Brief, Vol. 12, July 2015; and most recently, Butera, Candace. [“Are We Worried Sick about the Rent?”](#) in CityLab. 30 Jan 2018.

IV. Uptown United’s Plan

A. A rezoning about us, with us, for us

Unified Inwood has formulated an alternative zoning proposal to NYC EDC’s “Inwood NYC” plan. We are volunteers—not a professional planning team. Although our ranks contain experts in relevant fields, we do not have the same resources at our disposal as the City does. What we do have is a deep understanding of our community and what will serve it best. Our zoning proposal consists of three main elements that emerge organically to balance our community’s needs to preserve existing housing, create new and deeply affordable housing, protect small businesses, and address infrastructural deficiencies before any population increase occurs. We provide descriptions of the buildings we want to see along with zoning suggestions based on our research. A map is provided at the end of this section for reference. Our calculations based on these zoning designations suggest our plan will add roughly 7,500 residents to Inwood, as compared to the understated estimate of 14,000 additional residents through the NYC EDC’s plan. However, because we maintain that 100% affordable housing on all upzoned land is possible and necessary, as we argue below in IV.C, our plan will add roughly 2,600 affordable apartments. The City’s reliance on MIH would only create roughly 1,500 such units, many of which would be out of reach for our community.

	NO ACTION CONDITION	WITH ACTION CONDITION		NO-ACTION TO ACTION INCREMENT	
	City Projection from DEIS	City Projections from DEIS ²	Uptown United Projections ³	City Projections from DEIS ²	Uptown United Projections ³
Total Residential Units	798	5,146	3,435	4,348	2,637
Added Population @ 2.78/Unit	2,218	14,305	9,549	12,088	7,331
Number of "Affordable" Apartments					
City MIH: 25% @ Avg 60% AMI (\$51,400/yr.) + Library 100% Affordable				1,325	
City MIH: 30% @ Avg 80% AMI (\$68,750/yr.) + Library 100% Affordable				1,563	
Uptown United: 100% @ Avg 48% AMI					2,637

Table 1: Residential Development Under City vs. Uptown United Plans

1. Broad application of contextual residential and mixed-use commercial zoning

Our plan calls for contextual rezoning to preserve the character and affordability of the neighborhood and to discourage the deregulation of rent regulated housing in response to market pressures and displacement that spot rezonings south of Dyckman Street and upzoning to R8 on the “Commercial U” would accelerate. With these goals in mind, we suggest **R7A, or commercial equivalent C2-6A in some locations**, for all currently residential and mixed-use areas of Inwood, **including the blocks south of Dyckman St and north of Hillside Avenue and the so-called “Commercial U” along 207th Street, Broadway, and Dyckman Street.**

As we describe below, along with this zoning recommendation, we seek two additional requirements. First, where applicable between 215th Street and 218th Street, MIH may only be invoked alongside other term sheets and subsidy programs designed to achieve 100% affordability for our community, as detailed

² City projections taken from DEIS which works out to 36% of difference in maximum residential development capacity between current zoning and proposed zoning actually developed for "No Action to Action Increment." We think the City's development scenario is understated (see III above) so we used 50% for Uptown United.

³ Uptown United assumes 50% of difference in maximum residential development capacity between current zoning and proposed zoning actually developed for "No Action to Action Increment." These amounts are added to "No Action" to get the "Action" total. We believe 50% buildout of difference in zoning provides a more realistic projection than the methods used in the DEIS.

in Section IV.C below. Second, the “Commercial U” must be made a “special district” with regulations that will retain the small business characteristic of the area, as detailed in Section IV.D.

Special statement on the Inwood Library: We strongly and unequivocally reject including the disposition of the library’s public land and redevelopment of Inwood Library in the neighborhood rezoning ULURP; disposition of that land must undergo a separate ULURP process that recognizes its status as a public good and gives the community adequate time to focus on the library project on its own without having to focus at the same time on the many complexities of neighborhood rezoning.

Special statement on Tailoring for As-Built Conditions: For small pockets of existing two- and three-story residential buildings along lower Payson Avenue and 217th Street, we urge more tailored zoning to protect from the threat of developers destroying them to build market-rate, eight-story buildings under R7A and to safeguard their contributions to neighborhood character.

2. The three choke points of Inwood

The “Tip of Manhattan” before the Broadway Bridge, the area within a block of the 207th Street Bridge, and west Dyckman Street must be treated with consideration for how development at these sensitive sites will impact our entire community. Inappropriate upzoning as NYC EDC proposes would cause gridlock traffic at ingress/egress points and near our local hospital, increase air pollution, and delay emergency services and transit. We envision an innovative combination of 7- to 9-story 100% affordable residential buildings with commercial space and 4- or 5-story contextual live-work production spaces for artists, makers and craftspeople. We suggest **inclusionary R7-A with commercial overlays, some C2-6A, and M1-4/R6B for mixed-use manufacturing and residential buildings.**⁴ As with the first element of our zoning proposal, any upzoning must come with 100% affordable housing.

a. Tip of Manhattan choke point

For this choke point around the Broadway Bridge, we recommend inclusionary R7A with commercial alternative C2-6A along 10th Avenue, along with a two-block special district of M1-4/R6B across from the entrance to Allen Hospital. There could also be a carve-out of a block, along Broadway between 215th and 220th Streets, to condense and preserve the commercial and light industrial businesses and jobs there.⁵ Lastly, the City should redistribute the bus and sanitation vehicle garages more equitably, since Inwood houses vehicles that serve parts of the Bronx and the Upper East Side, to reduce congestion around the access point to Allen Hospital and make land available for 100% affordable housing and community spaces to be developed by nonprofits and/or a Community Land Trust, per [IV.C](#) below.⁶

b. West Dyckman/Riverside triangle choke point

This choke point encompasses Henshaw Street and Payson Avenue—the single-lane entrance and egress from the on and off ramps of the northbound Henry Hudson Parkway—as well as Riverside Drive and Dyckman Street. We recommend this area be zoned inclusionary M1-4/R6B. Strategically, this designation reduces development pressures on existing automotive uses near Inwood’s only direct access point to a major thruway, protects Tread bike shop that has become a

⁴ Several examples exist of the kind of zoning we seek. At this point, we suggest M1-4/R6B as has been used in [Hunters Point, Queens](#): “For this zoning designation, building bulk regulations for residential, light manufacturing and commercial uses would remain unchanged, and existing patterns of development on the midblocks would be reinforced. The allowable FAR [floor-to-area ratio] for new residential buildings would remain at 2.0 with a height limit of 50 feet. This FAR generally leads to four-story buildings, perhaps with space above for duplex apartments, and yard space at the rear. For industrial and commercial uses, the allowable FAR would remain at 2.0.”

⁵ New York Presbyterian has shown no interest to date in expanding their health care facilities to that site, and the idea of developing that M1-5 zone into substantial industrial uses is highly speculative. A better use of this site would be a small footprint garage of a few stories to preserve parking spaces and other lots that would be converted to affordable housing.

⁶ For example, move M8 sanitation vehicles closer to the Upper East Side, move Bx 7 and 8 back to the Bronx, and garage buses in the Bronx that do not enter Manhattan.

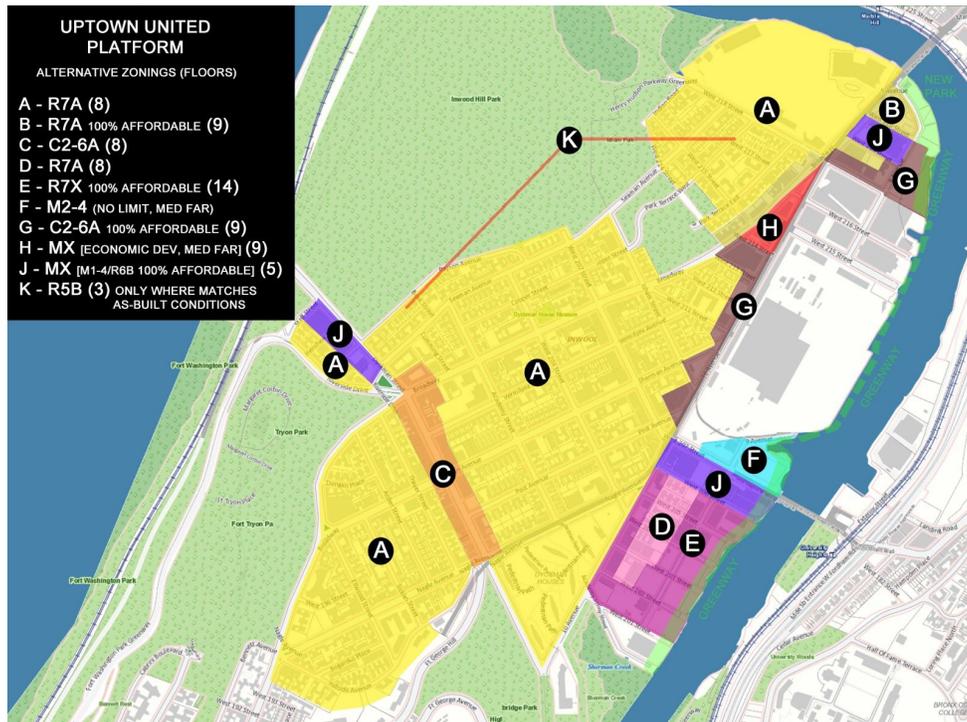
regional destination for Greenway traffic, and makes possible residential development in the form of artist live/work spaces. It also reduces the risk of increased traffic along Henshaw Street or Payson Avenue, which are already routinely backed up with travelers avoiding the Henry Hudson Bridge fare and seasonal visitors to La Marina.

c. 207th St Bridge choke point

The choke point surrounding the 207th Street Bridge calls for mixed-use development of inclusionary R7A and C2-6A along with two blocks of M1-4/R6B along 207th Street south of the bridge, rather than the NYC EDC’s plan of extremely high-density R8 and R9. The North Cove should be landmarked as a sacred Lenape burial ground and made off-limits for development. See our full position in [IV.F.1](#) below. Just south of the North Cove area and north of the bridge, we recommend a special district of M2-4 zoning, as the City had proposed farther south between 202nd St and 204th St along the Harlem River, where wholesalers and auto support businesses east of 10th Avenue can consolidate operations as they have proposed to do.

3. Potential for increased density if 100% affordability is guaranteed east of 10th Avenue

The area east of 10th Avenue and south of 206th Street is slated for some of the most massive upzoning under NYC EDC’s plan and would be the source of the highest numbers of luxury housing units that would displace important local businesses and cause market pressures across Inwood to skyrocket. We agree with the City in suggesting R7A to protect existing residential buildings where affordable housing can be preserved and medium density maintained. We call for **maximizing the potential for affordable housing** within the height context of nearby Dyckman Houses in areas along 10th Avenue and the Harlem River with a maximum height of 14 stories. We suggest rezoning of R7X to increase the density of truly affordable housing and provide possibility for more robust community services including a public library to serve the added population. As above, these buildings must be 100% affordable as we stipulate below in [IV.C](#). The City should include the Con Edison site in the rezoning area, which was previously destined for sale to the community as described in a [2007 Memorandum of Understanding](#). Once the City makes good on this plan to purchase the land, it can be the pilot project for such R7X buildings with 100% affordable housing. In addition, our plan demands a flood buffer along the Harlem River of at least 40 feet for this area of Inwood, detailed further in [IV.E](#).



B. Preserve existing housing

Inwood has the highest concentration of rent-regulated housing in Manhattan: as per NYC EDC’s own Neighborhood Snapshot, 61% of rental units in Inwood are rent-regulated versus only 39% across Manhattan. Many converging factors have put these units at risk, including vacancy decontrol, lack of oversight of deregulation, and tenants unaware of their legal rights and unable to access legal representation. These factors have resulted in increasing loss of regulated units and an as-yet unknown amount of illegally deregulated units. Northern Manhattan consistently has the highest rates of housing code violations, with an astounding 80% of cases in Manhattan Housing Court housing court. Additionally, up to 30% of Inwood rental units are under “preferential rent” leases, putting them at immediate risk of a significant rent hike if speculation increases. The recently released policy brief from the CUNY Dominican Studies Institute attests to the impact of these pressures on rent-regulated apartments on the majority-Dominican community of Inwood and Washington Heights, who are seeking relief in the Bronx.⁷ Community District 12 as a whole has seen enormous speculation in the real estate market, with 9 rent-regulated buildings recently selling for \$75 million in just one month.⁸

Our plan to protect existing housing involves four sets of actions that must occur *before* any rezoning takes place:

1. Prioritize long-term affordability through City-driven building acquisition

The City must set aside significant zero-percent financing and operating subsidies to allow for the purchase of naturally occurring affordable housing, primarily multi-family rent stabilized properties, as well as distressed and/or under-utilized properties from for-profit landlords. Buildings should meet one or more of the following criteria: are closest in proximity to up-zoned areas; are occupied by severely rent-burdened tenants; have apartments that are being held vacant and off the market; are sites of known landlord abuses, court cases, and HPD or DHCR violations. The Housing Not Warehousing act provides a legal framework through which the City could maintain an accurate track record of vacant or underutilized properties in Northern Manhattan to earmark possible acquisitions. This preservation effort could occur through several channels, including the City’s Acquisition Loan Fund, community land trusts (see [IV.C](#) below), long-standing and well respected Community Development Corporations in Northern Manhattan, and City-wide non-profit developers.⁹

We are proposing that the City identify roughly 1,000 units of naturally occurring affordable housing in the rezoning area and immediately begin working to calculate what combination of low-cost financing, operating subsidies, adjustments in equity requirements, etc. would be required to transfer ownership and responsibility for necessary repairs and renovations of these buildings to long-term mission driven ownership entities. Such an acquisition and preservation program must be in force with at least 50% of these deals in the pipeline before any ULURP process is approved. This is necessary both to prevent undue speculation and because protecting naturally occurring affordable housing is a lynchpin to preventing displacement from the rezoning.

2. Enforce and strengthen the rent laws

The City must take aggressive steps to enforce the rent laws in the rezoning area and beyond. Among these enforcement efforts must be to:

- Conduct an assessment of rental history of all units above 155th Street to send tenants that information and identify landlords who routinely abuse rent laws. Work with the State Division of

⁷ See: <http://dominicanlandmarks.com/Housing-Policy-Brief.pdf>

⁸ Savitch-Lew, Abigail. “[Which Neighborhood Facing Rezoning Faces Steepest Displacement Risks](#)” in City Limits, Jan. 11, 2018.

⁹ The City must adapt to today’s market conditions. The long-term view of the City that purchasing buildings at market amounts to rewarding speculation is outdated and self-defeating. Other municipalities in high-value markets are taking risks to preserve naturally occurring affordable housing. For example, in the communities surrounding Seattle, the King County Housing Authority (KCHA) has created a rapid acquisition fund that allows them to bid against developers to save affordable housing developments; this has allowed them to preserve affordable housing and to even develop new affordable housing in affluent areas.

Housing & Community Renewal (DHCR) to audit these same property owners' entire multi-family portfolios in the City for such abuses, including false or inflated establishment of "legal" and "preferential" rents, inflated rule of 40 rental adjustments, needless gut renovations and repairs, harassment, illegalities pertaining to J-51 and other tax abatements, lack of adequate maintenance of buildings and units, inflated building-wide MCI charges, and other means of raising rents beyond what would be legally allowed. Make these registered rents public so advocates can also identify patterns and intervene.

- Conduct broad and truly accessible public outreach to educate rent stabilized tenants about how about how to obtain rent histories and file overcharge complaints if applicable. Such outreach should make use of modern technology to bring the City and State resources into the community by allowing tenants to bring their leases to clinics where DHCR records are made available on the spot. Such clinics could be held in churches following Sunday worship services or in building lobbies or storefronts after traditional work hours to allow for accessibility to community residents.
- Extend funding for legal services to support court cases to restore rent-stabilized apartments and tenant organizing to protect against future illegal deregulation to all of Inwood, Washington Heights, and Marble Hill/Kingsbridge—ZIP codes 10034, 10040, 10033, 10032, and 10463— and cover all tenants who are rent-burdened, regardless of income or language of choice. Ensure robust outreach and guarantee funding for at least a decade.
- Put political might behind real rent reform, including lobbying for preferential rent reform and the repeal of the vacancy bonus and vacancy decontrol at the State level.

3. ***Immediately apply and fortify the Right to Counsel and the Certification of No Harassment:***

- Include immediately ***all*** of Inwood and Washington Heights in the pilot Right to Counsel program. Current City-mandated Manhattan legal aid only covers Harlem and select additional ZIP codes including Inwood, with a 5-year rollout plan to the rest of the city. This timeline will be too late to help residents just outside of Inwood facing displacement pressures from the rezoning process.
- Ensure permanent funding for newly-passed Certification of No Harassment (CONH) legislation—not just as a 36-month pilot—and supplement it with necessary organizing and outreach efforts. The CONH pilot, which includes Washington Heights and Inwood, requires positive review of landlords' five-year history showing no harassment before they can receive permits to alter, demolish, or change the shape or layout of their buildings. CONH functions most effectively as one preventative measure among many, and therefore will be less effective unless implemented immediately and with additional support. These additional programs must include funding for non-profit staff for organizing and outreach as well as City-led outreach to tenants and landlords.

4. ***Include Resources for Dyckman Houses***

Dyckman Houses consist of seven 14-story buildings on a 14 acre complex, bordered by Dyckman and West 204th Streets and Nagle and 10th Avenues. The complex features community space with more than 1,100 apartments housing more than 2,300 residents. This valuable source of permanently affordable housing has received no investment in the "Inwood NYC" plan. We call on the City to reduce the backlog of work orders and investigate and make all tenant-requested repairs by increasing funds for maintenance staff and contractors. We also call on the City to conduct and include a capital needs assessment of the Dyckman Houses and to fund a plan to meet those needs as part of any rezoning in Inwood. Lastly, with such an important public good and scarce asset, there should be no vacancies. We call on the City to conduct a study to determine the actual vacancy rate in Dyckman Houses and to immediately fill those units with tenants. We deplore the reality that the residents of Dyckman Houses have been left out of the City's plan to totally redevelop their community,

and we are calling for the City to engage in more meaningful and inclusive outreach with the residents of Dyckman Houses.

C. Create truly affordable, community-controlled housing

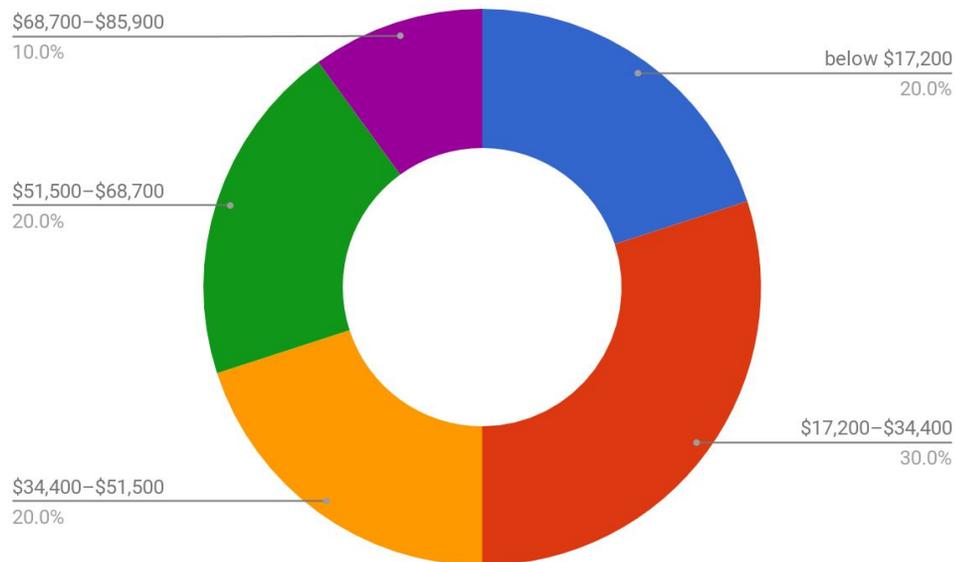
Any new housing developed on rezoned land should strive to fix the housing crisis, not exacerbate it. Mandatory Inclusionary Housing (MIH) originated as a policy to integrate white suburbs, but the City is now using it to gentrify working-class neighborhoods of color.¹⁰ New residential development must be *permanently* affordable for our community. It must match our income distribution: a **median income of \$41,687 or 48% of the Area Median Income (AMI)**, with over one quarter of families earning less than \$24,500, or 30% of AMI.¹¹

- The City must invest in deep affordability by committing significant resources to incentivize developers to go beyond the affordability levels of MIH. In addition, there must be a mechanism to guarantee that developers will take advantage of City subsidies.**

To best meet the needs of our community, we seek the following affordability levels for all new housing development in the rezoning area:

- 20% of new units for households¹² earning 20% AMI or below (\$17,200)
- 30% of new units for households earning 20–40% AMI (\$17,200–\$34,400)
- 20% of new units for households earning 40–60% AMI (\$34,400–\$51,500)
- 20% of new units for households earning 60–80% AMI (\$51,500–\$68,700)
- 10% of new units for households earning 80–100% AMI (\$68,700–\$85,900)

In addition, we seek at least 10% of new units reserved for seniors, at least 10% of new units reserved for people currently experiencing homelessness, and at least 50% of new units reserved for current and former Inwood residents who have been displaced due to high rents.



¹⁰ Seitles, Marc. The Perpetuation of Residential Racial Segregation in America: Historical Discrimination, Modern Forms of Exclusion, and Inclusionary Remedies. *Journal of Land Use & Environmental Law* Vol. 14, No. 1 (1998), pp. 89-124.

¹¹ Taken from the NYC EDC’s own report on Inwood, called the *Inwood NYC 2017 Action Plan*

¹² Based on households size of three.

These affordability levels depart from current City policy targeting “low income” residents that often overlooks “very low” and “extremely low” income residents who make up the majority of our community.¹³ Our proposed affordability levels would result in a building average of 45–50% AMI. This number matches the average AMI of our neighborhood and we believe it is financially feasible with modest increases to existing policies supporting creation of new affordable housing.

2. Any rezoning plan in Inwood must commit the City to supplement MIH funds for deeper affordability.

Reaching the affordability levels our community needs will require additional policies for buildings on privately-held land and built by for-profit developers, as well as a diverse array of developers with an emphasis on non-profits. Existing tax credits, including the Low Income Housing Tax Credit at the federal level and the 421-A revamp at the state level, will be important to this calculus. In addition, we recommend the City devise a new term sheet, to be piloted during the Inwood rezoning, that meets the aforementioned levels to ensure deeply and permanently affordable housing. The MIH program will *not* suffice in isolation to meet the needs of our community. In particular, the area east of 10th Avenue and south of 206th Street, as mentioned above, may only be upzoned to R7X if the affordability numbers matching our community’s needs are guaranteed.

3. Build affordable, community-controlled housing on public land.

Prioritize housing development on public land where the City has greater leverage to require deep affordability. The following site are viable and have been mentioned by Community Board 12, Manhattan Borough President Gale Brewer, and/or Congressman Adriano Espaillat:

- As mentioned above, the ConEd site which was previously destined for sale to the community as per the 2007 MoU
- Block 2197, Lot 75 occupied by Charter Communications vehicles
- The Department of Transportation building on 206th St.
- The parking lot occupied by the U.S. Dept of Justice, on 5051 Broadway (Block 2243, Lot 255)
- The DOT Safety City site in Washington Heights.

These parcels should be transferred to the Northern Manhattan Community Land Trust (NMCLT) to partner with a non-profit developer to develop deeply and permanently affordable housing on CLT land, in accordance with CB12’s recognition of the Northern Manhattan CLT in their December 2017 resolution supporting the concept of CLTs and acknowledging formation of NMCLT.¹⁴

D. Protect and sustain small businesses

Inwood’s independently-owned wholesale and retail businesses represent a vital, integrated and interdependent business ecosystem, all putting money directly back into the community through local purchasing and local jobs. Inwood’s small businesses provide opportunity and jobs in a largely immigrant community and are essential to the stable economic health and growth of Northern Manhattan. Yet 94% of Inwood’s small businesses lease their space, and 53% of Inwood’s small business owners say their rent is “barely affordable” right now.¹⁵ Should the rezoning pass as-is, the foundation of the local economy, with approximately 53% immigrant- and 29% women-owned business, will crumble quickly, taking our community along with it.¹⁶

It is crucial that any neighborhood plan aim to protect local small businesses from closing due to high rents.¹⁷ The upzoning to C4-4D, C4-5D, R7D, and R8A proposed for the “Commercial U” of 207th Street,

¹³ See p. 11 of [Housing New York 2.0 report](#)

¹⁴ CB12 wanted it to be clear that they support the CLT concept and acknowledge but do not necessarily endorse NMCLT.

¹⁵ According to [Neighborhood 360: Inwood Manhattan Commercial District Needs Assessment Report](#).

¹⁶ Since the City has refused to study the impact on minority and women-owned businesses in its EIS, we looked at the City’s 360 stuy database and relied on canvassing of business owners for this data. This is to be used as a reference only (it is not based on a scientific survey). Yet, the proportion of Latino-owned businesses is likely even higher on these corridors, not to mention among the wholesalers.

¹⁷ Per the [New York Times](#), November 2017.

Broadway, and Dyckman Street spells disaster and displacement for our immigrant-owned businesses. However, neither the current zoning designation of R7-2, nor the most widely proposed zoning designation of R7A, can protect our existing independently-owned small businesses, either. We strongly believe that the City Council must examine this issue in a series of hearings and take legislative action to create zoning text and new incentives that protect independently-owned businesses across New York City, especially in neighborhoods that have been or are targeted for rezoning.

In the meantime, we demand that any plan include non-zoning-based protections for small and local businesses, particularly those that serve and employ the working class and Latino community in and around the rezoning area. Any plan must acknowledge that our local businesses are not merely spaces of transactions: they are also a great resource for our neighborhood, a place of community engagement, and a network of interdependence that so many working class immigrant families rely on. As such, any plan to rezone must meet the following demands:

1. **Designate a special district along the “Commercial U”** to safeguard “neighborhood character.” Drawing on precedents including the Upper West Side’s “Special Enhanced Commercial District”: limit storefrontages to 25 feet, require at least 2 storefronts for every 50 feet, limit uses to types of businesses that will primarily provide essential community services to the local neighborhood in certain areas of the “Commercial U,” and limit sizes of grocery stores to 15,000 sq ft in the “Commercial U.”
2. **Designate special districts** for Inwood’s **wholesale businesses**, which serve Northern Manhattan and the Bronx, and **auto repair industry**, which serve most of Manhattan and the Bronx. These industries have expressed willingness to consolidate operations in exchange for this designation.
3. **Increase property taxes or fine property owners for empty commercial space** smaller than 5,000 sq ft after a period of vacancy exceeding 180 days to incentivize occupied storefronts and vacant land.
4. Include **anti-harassment penalties to protect small business owners** like those for residents, penalizing landlords for harassment of small business owners and denial of demolition or construction permits when harassment is found.
5. In the zoning text, **implement storefront design regulations** that reflect human-scale building facades to help reduce the spread of chain stores.
6. Provide **relocation assistance** to help businesses who want to stay in the neighborhood during construction periods.
7. **Enact the common-sense policy changes included in the City Council’s December 2017 Planning for Retail Diversity report**, including:
 - a. Collect data on storefront retail to study the rezoning’s potential to displace small businesses, especially minority- and women-owned businesses, and affect street vendors (Rec. #3, p. 28)
 - b. Apply Special Enhanced Commercial Districts to portions of the “Commercial U” already saturated with banks and large-format retailers to limit their presence on the ground floor, which would also disincentivize the warehousing of small retail space by landlords hoping to attract such a client (Rec. #8, p. 43)
 - c. Relatedly, enact formula retail restrictions along the “Commercial U” (Rec. #9, p. 44)

- d. Pilot an “inclusionary affordable commercial space zoning tool” analogous in principle to MIH with neighborhood input determining the the types of businesses eligible for the zoning bonus (Rec. 10, p. 45)
- e. Provide incentives, including tax abatements and direct subsidies, for landlords to renew affordable leases in good faith with small business owners (Rec. #19, p. 60)
- f. Require storefront vacancy reporting (Rec. #4, p. 29).

E. Fortify and green our infrastructure

Inwood’s infrastructure is crumbling. Transit is overcrowded and unreliable. Decaying electrical, gas, water, and sewer lines pose hazards. Schools are over capacity. All of this must change before new development can begin. In addition, these infrastructure considerations must join sound environmental planning that accurately and honestly accounts for the impact of climate change on our neighborhood by installing flood buffers and prioritizing green construction.

1. Improve the functioning of transit infrastructure.

The subways and buses in Inwood have already proven inadequate, with massive, frequent, and unpredictable delays and cancellations of service as well as overcrowding, even at late hours. These symptoms will only increase in frequency and severity with the addition of well over 14,000 new riders and destination retail in Inwood. Our plan demands more buses and subway trains at all times of day and night throughout the year, on all lines in Inwood in order to provide adequate service without delays and interruptions of service.

2. Enlarge and repair subsurface infrastructure

Subsurface infrastructure has degraded to a critical point. Ninety-year-old electrical cables, some with paper insulation, put large swaths of Manhattan at risk of blackout should they fail, and indeed Inwood has suffered outages in recent decades from burnt feeder cables. Unrepaired 100- to 150-year-old gas lines pose risk of explosion¹⁸. Lead has been leaching into our schools’ water supply.¹⁹ Storm sewers back up into certain streets in heavy rain events, for example, at Riverside Drive and Seaman Avenue near the Henry Hudson choke point.²⁰ When there is work on water mains or one breaks, many residents get brown water. An increase in population will push this crumbling infrastructure over the edge. In previous upzonings elsewhere in the City, there has not been a concomitant increase in infrastructure capacity or reliability. A complete overhaul of subsurface utilities including electricity, gas, water, and sewer must occur *before* any rezoning can take place in Inwood.

3. Increase Public Services

The existing public services for Inwood are already stretched to their maximum, with overcrowding of schools and a lack of adequate healthcare and municipal resources. A substantial increase in population without increasing capacity will lead to overflowing classrooms and taxed schedules such as morning lunches in schools. The award-winning Inwood Library should be expanded to accommodate new residents well beyond the square footage proposed in the ULURP. The Inwood post office is strained beyond capacity and needs to be expanded, or there needs to be an additional zip code and station, perhaps in any new development east of 10th Avenue.

4. Install Flood Buffer

Much of eastern Inwood sits in 100- and 500-year floodplains, but parts of these areas have flooded far more frequently and will flood more frequently in the future. Our plan buffers the

¹⁸ Personal correspondence from our dearly departed Isaiah Obie Bing.

¹⁹ Pichardo, Carolina. “[Lead Levels in Inwood School’s Water Are Up To 450 Times Federal Limit](#),” *DNA Info*, 9 Feb 2017.

²⁰ Personal correspondence with NYC Department of Environmental Protection (DEP), 2016–2018.

coastlines in Inwood that are prone to flooding with areas resilient to flooding such as wetlands and parklands. We call for a 40-foot buffer in two parts, along the Harlem River from the boathouse south of Dyckman Street to North Cove (the southern park), picking up again from just north of the rail yards to the Broadway bridge (the northern park), connected by a cantilevered structure at river's edge along the rail yards to complete the greenway. To this end, these two City-owned parks should be designated instead of relying on narrow strips of privately owned waterfront space developed by individual property owners. The northern park, currently designated M1-4 in the City's plan, north and east of 9th Avenue, would continue to be set aside as M-zoning, until such time as it could be purchased as City-owned parkland. A park at this location would act as a necessary northern terminus to the adjacent new waterfront proposed in the "Inwood NYC" plan, much as Sherman Creek lies at the south end of that redevelopment area. A park at this location would also provide a much-needed alternative to the overcrowded Inwood Hill Park peninsula and pits to soak up floodwaters. These "green" buffers should be designed in accordance with flood zones based on 2032 climate projections, not historical flood maps.²¹ Generous swales and tree pits for street trees should be installed on all sidewalks in the floodplain to absorb water.

5. Complete the Greenways

In the EDC's November 2015 report from their Parks & Streets Workshop, completed greenways featured prominently among community suggestions, with many pointing to the Northern Manhattan Parks Master Plan of 2011. With the completion of the northbound Henry Hudson bike path several years ago, bike traffic from cyclists riding from points south significantly increased in Inwood immediately. As greenway links are established north and south, bike traffic will increase further as Inwood becomes more of a destination for day trippers. The NYMTC Hudson River Valley Greenway Link study developed a conceptual approach to a phased plan for establishing a link between the Hudson Waterfront Greenway in Inwood and the Old Croton Aqueduct Trail in southwest Yonkers. This greenway plan needs to be carried out to connect the Hudson Greenway in Inwood through Riverdale to Yonkers. To finish the network, the Parks Department needs to complete the Phase II of the water-level Hudson Greenway to the south, as well as the Harlem Greenway in and approaching Inwood from north, and to connect to the existing waterfront Harlem greenway further south in Manhattan. To facilitate safe east-west transfers from the Hudson to the Harlem greenways, we call for the preservation and enhancement with planted buffers of the Dyckman Greenway connector and other bike lanes in Inwood.

6. Mandate LEED Standards and Encourage Solar Construction

Building specifications and land-use design should reach LEED-Gold standards or higher and renewable sources of energy should be utilized for new and existing buildings. Inwood has a remarkably uniform building height with a minimum of shadow, making the community an excellent site for rooftop solar development. The November 2017 CB12 resolution speaks to this desire and suggests that this potential for solar rooftop development be preserved (i.e., prohibit taller buildings that cast shadows). Therefore, building specs and design should include, where feasible, green building technologies, solar and green roofs, room for recycling and composting, greywater systems, and other infrastructure improvements; and use of alternative energy sources, such as solar, wind, biomass, or hydro. The carbon cost of every building should be established and framed in context of the current carbon cost per person and per building as a function of building density and age.

7. Pursue Innovative Organics Management Strategies

²¹ Specifically, the 'flood zone' scenario should be based on the baseline 'High' scenario in NOAA (Sweet et al, 2017). or high '8 feet' scenario in the NCA4 CCSR (Horton et al, 2017) for 2032 with a superimposed storm surge, 0.1%, 0.02% flood probability. N.B., this baseline scenario is slightly different/updated from the NYCPC.

The former Inwood incinerator building is now used as a garage, but if retrofitted, it could also be used to test in-vessel composting and anaerobic digesters and to process organic materials collected from Inwood buildings by DSNY. This should be explored.

F. Respect the Community

The following recommendations should not be controversial and provide a baseline of expectations we have of any rezoning proposal. If these measures cannot be guaranteed going forward, the process must cease until resources are provided for collaborative, meaningful, deliberative engagement with the community, and of community members with each other.

1. Reckon with Inwood's colonial legacy

Any rezoning effort must confront Inwood's colonial legacy. Any proposed rezoning of the North Cove can only take place after formal consultation with Lenape people. The burial grounds of the Lenape people, including the North Cove, have not been respected or protected from development, a further insult to the theft of their land. This area is still used for sweat lodges and other ceremonies by the modern-day indigenous community.²² A rezoning presents an opportunity to memorialize the presence of the original inhabitants of Inwood and reckon with the legacy of settler colonialism. As we suggest above, the North Cove area and any other areas that constitute sacred burial grounds should be landmarked following a process similar to that protecting the African burial grounds on 126th St in East Harlem and set aside as parkland. A similar reckoning must occur with the African burial grounds at 212th Street and 10th Avenue, which should be acknowledged publicly and memorialized as the resting place of slaves owned by the Dyckman family. Accompanying any rezoning should be a public dialogue around decolonizing the toponyms of Inwood.²³

2. Provide jobs for our community

New developments and renovated infrastructure need to create good construction jobs with responsible contracting language²⁴ at prevailing wages for local residents. Developers, contractors, and subcontractors must demonstrate that at least 30% of all work hours will go through local hire to Inwood and broader CB 12 residents through pre-apprenticeship training for long-term career development in the building trades unions. This recruitment and training effort should receive 5% of total city subsidies per project to operate effectively and transparently. There is precedent for this type of pre-apprenticeship program, including the commitment of the building trades unions to invest in community training and growth. There is also precedent and legal counsel to include this provision in the zoning code due to the environmental impact of the wide variety of construction jobs that will be created by development. We must ensure that development in our community provides a long-term pathway for better employment and better quality of life.

3. Fund and support the diverse and transformative arts and cultural work in our community

Investments in our community must target areas of need identified by the community. Arts and culture are one such area. We demand construction of a roughly 10,000 square foot, flexible theater space that seats between 150 and 200 people with 20- or 25-foot ceilings and houses 2 or more rehearsal spaces, gallery space, and administrative offices. Ownership of the land on which this facility is built must be given to a Community Land Trust with non-profit developers having an advantage in Requests for Projects. The theater space must be managed by non-profits with roots in the Inwood/Washington Heights community. In addition, we demand a \$10 million fund for arts and culture to be administered by the community to fund space subsidies

²² See "The Indian Life Reservation," Reginald Bolton. Luis Ramos of the Taino Community runs regular ceremonies on this land.

²³ See: <http://myinwood.net/inwoods-forgotten-slave-cemetery/>

²⁴ For an example of such language, see [this white paper](#) by NYC Community Alliance for Worker Justice

in the new venue, free arts programs to local schools and senior centers, and grants to artists and collectives with addresses in Inwood and Washington Heights.

4. Engage the community

Many of the community members that our nonprofit groups, tenant and community organizers, and coalition members have engaged still do not have a clear understanding of the Inwood NYC plan and have not received notices by the City about the Inwood NYC meetings and events. Many community members have learned about these opportunities only to come to an Inwood NYC event and be told there was not sufficient space to enter the room, to find no interpretation provided, or to feel that their comments were not taken seriously by the facilitators. Only one open community event was structured so residents got to see what they each proposed; they saw a unanimous community consensus emerge, only to see a month later that EDC had totally ignored that consensus.²⁵ These types of experiences make it less likely for people to return to another meeting in the future, discouraging meaningful engagement. Beyond this, a vast additional number of community residents have yet to receive any engagement or information from NYC EDC or other city-affiliated departments about the rezoning—particularly the working-class, primarily Dominican and Spanish-speaking community east of 10th Avenue in whose backyards the most dramatic rezoning is slated to occur. **We have the right to a deliberative engagement process that attends to the real needs of our community.**

Going forward, we need:

- a. Advance notice of all meetings: a minimum of 3 weeks in order to work with local nonprofits, community organizers, tenant associations, and faith communities to assist in developing an outreach plan that allows at least 2 weeks to implement and actually engage in community outreach
- b. Meetings scheduled in the evenings or on weekends to accommodate the working class fabric of our community
- c. City agency outreach that includes notices in local newspapers, especially Spanish-language media, as well as City agency street outreach to pass out flyers in the same way and with the same zeal that political candidates canvass prior to elections; this includes a focus on NYCHA buildings that will be among those most affected by the proposed rezoning
- d. All key meetings and public hearings in the ULURP must be located in Inwood or Washington Heights rather than downtown (e.g. City Planning hearing, City Council votes, etc.) and in venues that hold 300+ people and can adequately accommodate active participation from community members, with the City paying for space rental as needed
- e. Language equity, including translated Spanish-language materials at the same time the English materials are released and interpretation services at every meeting and for the full duration of the meeting.

V. Conclusion

The idea to better utilize underdeveloped land to benefit a community badly in need of more affordable housing is not a bad one. In fact, the communities that make up our groups deeply support the urgency of addressing the crisis of decreasing affordable housing stock in Inwood and Washington Heights, one of the last bastions of affordable housing for working-class people in Manhattan. However, we take issue

²⁵ The “charette” at the June 2017 Community Board 12 Land Use Committee meeting: This event was flawed as the space was too small to accommodate everyone who came and EDC only allowed residents to deal with part of the rezoning plan, not all of it. But still, the 150 participants produced a remarkably strong unanimous consensus which was not at all reflected in EDC’s July 2017 Inwood NYC Plan Update.

with a top-down city plan that does not adequately incorporate our community's ability to dream and envision the sort of neighborhood we want for ourselves.

Instead, we have thoughtfully crafted **a more just rezoning proposal** that emerges organically from knowledge in and of our community. Our plan is informed by a powerful and balanced ethic of contextual development and preservation of the good in our neighborhood. The rezoning we propose accommodates all of us: we protect existing residential and commercial developments throughout much of the neighborhood, thoughtfully plan lower-density carve-outs for creatives in our community near high-traffic choke points, and provide the opportunity for increased density for developers who go the extra mile to ensure environmental sustainability and 100% permanent affordability for our community near the Harlem River. Our proposal allows for responsible, community-driven growth while protecting our neighborhood from predatory speculators and unchecked market pressures.

In conjunction with these zoning changes, and to redress the speculation we have begun to see in Inwood that is all too familiar in Williamsburg, Downtown Brooklyn, Flushing, Bushwick, and other neighborhoods in advance of a rezoning, we must **put preservation first**. There are numerous strategies that can protect not only our many tenants who live in existing affordable housing stock, but also the vacant units that could be made affordable, the land that makes up the character of our neighborhood, and the small businesses that make our community thrive.

Preservation of these existing resources is not in opposition to ethical and comprehensive development. It is a necessary complement. But for this development to be acceptable to our community, we must **make it truly affordable** for our community. Our members have done the work: the financial models of non-profit developers show that we can, and that we must, build housing our community can afford in buildings that can still cover their operating costs and function well. We must be more creative than the profit-driven mechanisms we are presented. We have a host of additional tools for deeply affordable housing, like community land trusts and eminent domain, that enjoy both political will and popular support.

We must also **protect our small businesses** by pushing for comprehensive zoning reform as well as enacting measures that are already in place and functioning well elsewhere in Manhattan. These special districts, protections against landlord harassment, and tax incentives will ensure Inwood retains its immigrant- and women-owned small businesses that serve our community. We must aim to diversify our existing mix of businesses to ensure we can get more of what we need in our neighborhood without succumbing to the predatory influence of Business Improvement Districts (BIDs).

We cannot continue with any development plans if we do not **repair and fortify our infrastructure**, ensure school desks and resources for our children and the children of new residents, and comprehensively prevent safety risks such as MTA overcrowding; fires from broken gas lines or ancient, often paper-insulated electrical cables; contaminated water supply; or inundation of shifting floodplains. We have seen the risks of out-of-control development in neighborhoods that lack proper infrastructure. These cautionary tales should urge us into prophylactic and already-overdue revamping of our hundred-year-old infrastructure.

Finally, planners must **respect our neighborhood**. Our community has shown what it means to be respected: it means creating a plan in collaboration, that follows our desires and concerns for our neighborhood, rather than pigeonholing our responses into a predetermined list of options. It means engagement from the beginning, in the languages that we speak, at the speed at which we can ensure the participation of working folks, young families, and all who live in the community. It means creating a plan that provides jobs that are both living-wage and safe through partnerships with our unions who have already expressed support, and we must do this to ensure that the job growth that occurs through development revitalizes our community members' futures as well. And this respect for the community is the bedrock of what neighborhood planning means: we cannot plan for a neighborhood if we do not plan with our neighbors.

Each priority outlined in this plan is viable. It is legally possible, financially feasible, and politically actionable at the local level. Enacting these demands merely requires a willingness to collaborate with our community. And it requires a willingness to be truly creative, to learn from the lessons of other neighborhoods and our fellow advocates across the country who have created unconventional solutions and found that they work when people work together. We know that nothing can be for us if it is about us but without us, so we hope that this research over the past two years is a call for the city to truly act with us, to incorporate our recommendations, and to be as accountable as they can be to us, the people of uptown united.

ACKNOWLEDGEMENTS

This platform merges various contributions from the Northern Manhattan is Not For Sale (NMN4S) coalition and member groups Inwood Preservation (IP) and the Inwood Small Business Coalition/Coalición de Pequeñas Empresas (ISBC/CPEI). Other contributing groups include Save Inwood Library (SIL), Northern Manhattan Community Land Trust (NMCLT), Unified Inwood (UI), and the Inwood Owners Coalition. We are deeply grateful to the technical assistance providers at the Pratt Center on Development, the Urban Justice Center, and the Association for Neighborhood Housing and Development, as well as advice from staff at the Fifth Avenue Committee, the Parodneck Foundation, the Northwest Bronx Community Clergy Coalition, and CASA New Settlement. This paper would not have happened without the feedback from other neighborhood groups including the Northern Manhattan Agenda, the Upper Manhattan Interfaith Leaders Coalition, and Community Board 12.



C/- 1825 Riverside Drive, #6A, New York, NY 10034

Dear City Council Member:

We are at a historical moment in the city. Coming before the council is the proposed Inwood rezoning.

This plan had its beginnings as a plan to make the Harlem River an amenity for Inwood residents. The plan was then commandeered and turned into a give away to developers.¹

The current proposal was supposed to reflect input from the community, however it is obvious that the plan was devised from above and is being imposed on Inwood against the wishes of the residents.

From the beginning of the process we have asked for extension of the boundaries of the rezoning to include all of Inwood, including Columbia land to the North and south to Inwood's natural boundary at 193rd Street.

The EDC's Inwood rezoning plan states that one of its main goals "is to preserve and create affordable housing." However, this plan will cause the loss of more affordable housing units, directly and indirectly, than it will create. The up zoning of the "Commercial U" to allow hotels, hospital expansion and nightclubs belies this goal. It is already happening; <https://www.manhattantimesnews.com/eviction-fictiondesalojo-de-ficcion/>

The EDC plan will result in hyper-gentrification, clearing out lower-income residents. Like many other recent re-zonings, going back to those of Williamsburg and 125th Street in Harlem, the displacement resulting from this plan will have a much greater impact on people of color and immigrants.

The EDC's proposal also threatens to displace our small businesses. The proposed upzoning of commercial and industrial areas to allow much taller buildings will give owners an incentive to demolish the smaller 1 - 2 story buildings and displace the businesses.

The Inwood Library is an award-winning library. Leave it alone. The CLOTH, Andrew Berman designed housing/library/pre K development should be built on city land in east Inwood for all the new residents. They will need a library.

Inwood as a neighborhood works. The Uptown United Platform is sustainable. It maintains the beauty and harmony of our primarily working class neighborhood and adds much needed truly affordable housing. Please read our alternative plan.

<https://www.documentcloud.org/documents/4384164-Uptown-United-Platform-Feb-21.html>

Sincerely,

Katherine O'Sullivan

¹ https://therealdeal.com/issues_articles/massive-inwood-parcel-set-for-high-rise-waterfront-housing/

July 13, 2018

Katherine O'Sullivan
1825 Riverside Drive, #6A
New York, NY 10034

Chairman Moya and Members of the Zoning and Franchise Committee:

Two minutes is a very short time to cover all aspects of why this EDC rezoning must not be allowed to become law

I am an immigrant and citizen who votes. I have lived in Inwood for 25 years.

I believe that Inwood Library is a significant historic building that deserves preservation in its own right. It was designed by Tachau-Vought in 1940, interrupted by WWII and built in 1952 according to the most modern thinking on libraries at the time,

The proposed library demolition plan is being used to push the up zoning of the "Commercial U", the replacement library/housing proposal cannot advance without an up zoning. This is circular logic and internecine thinking.

Despite repeated requests the Andrew Berman designed proposal has not been released to the public for full review. All we have seen are some "pretty pictures". Why is this? Is it because there are no actual blue prints? What are the plans to merge this lot with the Madd Equity owned lot beside it?

I do not believe Inwood will get a better replacement library for the stated amount of \$10 million. The Sunset Park library/housing development comes closest to what is being proposed for Inwood, but it did not require an up zoning. The costs and time required to build will not finalized until completion (2019 if on schedule). See table.

Library	Inwood	Donnell on 53rd St	Battery Park City	Stapleton Branch, Staten Island	Mariner's Harbor, Staten Island	Washington Heights	Sunset Park Brooklyn	Inwood Current Proposal
When Built	1952	1955	2010, 1100 Architect	1907	2013, Atelier Pagnament Toriani	1914 Carriere & Hastings		1952
Size(Square Feet)	Per EDC 17,300 USABLE SF (where is the missing 4000SF?)		10,000 SF	4,800 SF increased to 12,000 SF	10,000 SF	13,000 SF	12,000 SF expanding to 21,000 SF	Shrinking to ?????*
Collection Number		300000 reduced to 20,000 new books & ? CD's & DVD'S	23,000 items					
Time	3 years 1998 - 2001	8 years, 2008 - 2016	Completion 2010	2010 - 2013	Completion 2013	2010 - 2014 teen center opened in 2016	2017 - 2019?	?
	Refurbishment	Demolition & Rebuild	New Library	Refurbishment	New Library	Refurbishment	Demolition & Rebuild	Demolition & Rebuild
Cost	4.3 million	23 Million to build out from the core given by developers	Location provided by the city for \$1.00 per year rent to 2069. 6.7 Million (3.5 Million by Goldman Sachs)	15 Million	12.5 Million	12.4 Million (does this number include the 4.4 Million for the adult & teen center?)	10 Million to build out 2 million for the temporary library (5,000 SF) Overages?	10 Million **

There is still no location, no budget and no plan for any interim library since this misguided plan was first made public. Inwood residents have asked for details and been given no answers.

The Eliza library/housing, CLOTH proposal should be built, but on City property east of 10th Avenue. All the many new residents there will need a library.

As a public project it must have its own ULURP. Will Planning, Dispositions and Concessions subcommittee be reviewing this proposal separately? Is this not required by City law?

This rezoning plan is and has been, since before 2006, a political process pushed by the EDC and the Mayor's Office.

This plan is not about what would make a great neighborhood better, through sound planning principals.

Inwood residents have been involved at every opportunity and have been largely ignored. The plan is being pushed through to achieve political goals at any cost.

This proposed rezoning like many others, Williamsburg, 125th Street, is targeting a community predominantly of color and immigrants.

The displacement resulting from these re-zonings is having a much greater, disparate impact

on these communities.

These re-zonings because they target communities like Inwood, are racist.

Please Vote NO! Support the Uptown United Plan

Sincerely,

Katherine O'Sullivan

Statement of Bill Murawski
to
New York City Council
Subcommittee on Zoning and Franchises
Subject: Rezoning of Inwood
April 13, 2018

My name is Bill Murawski. I am the publisher of DeWitt Clinton Express, A Neighborhood Newspaper that is distributed on the west side of Manhattan that includes the neighborhoods of Inwood, Harlem, Greenwich Village and Hell's Kitchen.

Until 1995 I was the President of the AA Club – Apathetics Anonymous – and all that changed when it was discovered the Giuliani Administration was going to use DeWitt Clinton Park, located in Hell's Kitchen, as the test case for the privatization of all local parks. I attended all of the meeting regarding the issue and informed all of the elected and appointed officials that if the privatization was approved, I would sue the city and I did. To date, Dewitt Clinton Park is the only major park in City Council District 3 that has not been privatized.

It was also a time when Hell's Kitchen was being gentrified and later rezoned, much like the rezoning project that is planned for Inwood. The Hell's Kitchen neighborhood as I once knew it is long gone and only a handful of businesses that were established there 50 years ago or more continue to exist.

Although born and raised in Hell's Kitchen during the 50's and 60's and continue to live there, I also have roots in Inwood during a time that the Gary Owens Pub existed and the Battle of the Bands were held at the Church of the Good Shepherd

My maiden voyage into city politics began 23 years ago and not knowing anything about city government at that time, my legal action shook the foundations of city hall and that issue was only about a park. The rezoning of Inwood is about an entire neighborhood, which includes the lives of many of its residents and the survival of its businesses.

With all that stated, in the event the rezoning is approved by the city council to move forward, I will sue the city once again and especially since the project is moving way too fast. As is often said, "haste makes waste" and it is shameful that the rezoning as it is, exists.

Fort Tryon East Neighborhood Association
FortTryonEast@gmail.com

July 12, 2018

City Councilmembers:

I am writing in my role as co-director of the Fort Tryon East Neighborhood Association, a community group in the Inwood neighborhood of Upper Manhattan. We call on you to follow the lead of our Community Board, our Borough President, and the vast coalition of community groups that have united under the Uptown United coalition to **VOTE NO** on the disastrous 'Inwood NYC' rezoning proposal.

Fort Tryon East Neighborhood Association is the community organization that represents residents of Inwood who live south of Dyckman Street. The traditional southern boundary of Inwood is the intersection of Broadway and 193rd Street, but the 'Inwood NYC' rezoning plan inexplicably and arbitrarily ends at Thayer Street, just one block south of Dyckman Street. This leaves thousands of Inwood residents out of the plan that will profoundly affect their community for generations. If the city is going to rezone Inwood, then the Fort Tryon East area, a central and iconic portion of the historic neighborhood of Inwood, must be included in the R7A contextual zoning district.

For years, Community Board 12 has called for contextual zoning in the district and specifically included the area south of Dyckman in the 'target area' considered at highest risk for exploitative development (CB 12 Contextual Zoning Resolution; October 2012, rev. July 2016). From Day 1, however, the City has ignored this recommendation and has almost completely excluded the Fort Tryon East area of the neighborhood. Over many months of consistent requests at community engagement events, public meetings, and through written inquiries, NYC EDC continued to stonewall requests to extend the rezoning area to include our part of the neighborhood — even in light of the fact that the highly contentious Sherman Plaza luxury development plan that inflamed massive protests in the neighborhood and resulted in a city council vote against an up-zoning proposal at that site, *is in our part of the neighborhood!* After ignoring our requests for months, NYC EDC then shifted arguments, telling us that it was 'too late' or 'too expensive' to change the parameters of the rezoning area and that we were simply out of luck. This is reflective of NYC EDC's overall approach to 'community engagement,' which has been insincere and ineffective.

The potential impact of heightened displacement of existing tenants and loss of rent-regulated units in this area is tremendous, especially due to the high number of rent-stabilized tenants here who are paying a preferential rent and our proximity to the 'Commercial U' area in the Inwood NYC plan, and it cries out for the protection against the potential of a large influx of market-rate housing that only contextual zoning can provide. Inwood has the largest stock of rent-regulated housing of any neighborhood in the city; any rational affordable housing initiative must have as its *first* priority the preservation of those existing units. Unfortunately, the Inwood NYC plan rejects this premise, failing to learn the lessons of previous rezonings in which the impact of large-scale new market-rate development has devastated working class neighborhoods and led to hyper-gentrification and massive displacement. Given the economic demographics of Inwood, MIH is not an efficient mechanism for affordable housing creation because most Inwood residents make too little to qualify for the 'affordable' apartments in new developments. In short, the Inwood NYC plan asks the community to accept a small number of

Fort Tryon East Neighborhood Association
FortTryonEast@gmail.com

new 'affordable' units that most residents will not be able to apply for in exchange for thousands of new market-rate units whose higher rents will affect each and every current resident of the neighborhood. We reject this irrational, dangerous, and abusive mishandling of our community and of the city's larger affordable housing crisis.

Instead, we support the Uptown United plan, a comprehensive and serious proposal that has the endorsement of a huge coalition of community groups and the support of the neighborhood. The difficulty of planning for urban growth without sparking hyper-gentrification and displacement is the central problem affecting successful cities across the globe. The Uptown United plan is a realistic attempt at solving these problems while laying the groundwork for continued, sustainable growth and community empowerment. The city should use this plan as a starting point to plan for sustainable growth in Upper Manhattan while also protecting and investing in the existing community which has been a safe haven for immigrants and working class families for generations. In the meantime, the city council ***must reject*** the Inwood NYC plan, which would do nothing short of destroying our community. **PLEASE VOTE NO!**

Sincerely,

David Friend,
Co-director, Fort Tryon East Neighborhood Association

I will begin by urging you to vote “NO” on the INWOOD rezoning plan.

The NMN4\$ coalition has worked with a board range of neighborhood people each with their unique set of skills to produce the UpTown United Plan that actually addresses the issues of our community and is the plan we urge you to support.

I compliment Community Board 12 for their independence and diligence in voting No with recommendations that mirror the Uptown United Plan.

Borough President Gale Brewer also voted No with recommendations.

The third ULURP review goes to the City Planning Commission, which oftentimes has been described as “an enabler of developer-driven project’s.” It was no surprise they approved the EDC plan.

Commissioner de La Uz was quoted saying, “ULURP unfortunately fails to address the community’s primary concerns. It is extremely disempowering for residents to be engaged and then not be listened to, especially when what the residents are sharing is in the City’s best interests and advances inclusive growth and equity.”

The EDC’s testimony claims it reached out to the Inwood community for the purpose of gathering community input to be incorporated into the rezoning plan. Nothing can be further from the truth. I’ve attended all the workshops. Each is a carbon copy of the other. The sole purpose of these workshops is to promote the EDC plan. The workshops are an elaborate charade with maps, charts, sticky notes, small group discussions and then a large group share. If the EDC listened and took serious note of what was said during the share, they would have made changes. That is, if they were really interested in community input. Over the 2 1/2 year process they have ignored input from the community.

The Board of directors of the EDC and the 13 City planning commissioners are either appointed by Mayor deBlasio or indirectly approved by Mayor deBlasio. Sad, but not surprising to find the EDC and CPC supporting the mayor's policies.

I am asking the city council to find your inner Alexandria Ocasio-Cortez voice and vote No on the EDC plan and consider the Uptown United Plan.

Councilmember Rodriguez we know your office has been inundated with calls for you to vote NO. Sadly, your response was to send out a press advisory entitled, "Building A Community For All: Council Member Ydanis Rodriguez's Priorities in Inwood Rezoning." This 5 point proposal has good ideas, however, none of the 5 points are controlled by rezoning. Moreover, they are truly a distraction from the real issue of rezoning.

Councilman Rodriquez, I am asking you to reunite with your inner Alexandria Ocasio-Cortez voice and take the socially responsible action and vote no on the EDC plan.

Testimony submitted by Denise Rickles on the July 10, 2018 City Council hearing on the Inwood Rezoning Plan.

Inwood Rezoning

Ahead of the upcoming vote on the Inwood rezoning plan I would like to ask that this plan be rejected.

As was made abundantly clear, as written it will hasten the dangerous gentrification of this neighborhood and drive the neediest of families out of their homes.

The plan to allow out-of-context building heights east of Broadway will put an incredible strain on our already overcrowded busses and trains, not to mention schools and other public resources.

Access to the waterfront is not a "need", it's a "nice-to-have". What Inwood needs is housing that is affordable to OUR population. We need the city to see the worth in this, and subsidize developers so that they agree to provide permanent, affordable housing for this city.

Inwood needs to be rezoned for this to happen, that is not in dispute. I think everyone agrees that the northeast section of Inwood is underutilized. But please, do not allow luxury highrise buildings to take over. Do not allow the "commercial U" to be redeveloped in a way that will decrease the quality of life of the surrounding blocks and create dangerous levels of gentrification for those living in that area.

Please help maintain the diversity of this neighborhood and reject the rezoning plan.

Thank you for your time and service.

Sincerely,
Marin Conaughty
10034

Inwood Rezoning

I am a long time resident in North Manhattan and I am watching as my vibrant, wonderful community is already being wrecked by the battering ram of greed. The planned rezoning will accelerate this process of destruction. My neighbors and I have marched, picketed and testified against the rezoning. At CB12 meetings literally hundreds have made known their nearly unanimous opposition and have voiced their fears that tenants will be displaced and small businesses replaced by boutiques and big boxes. Is this opposition to be disregarded to protect the profits of developers and landlords? Is the advertised democratic process nothing but farce? Has the fix been in all along? Councilman Rodriguez and the City Council will soon provide the answers to these questions. If they approve the re-zoning plan we will know that they have cynically disregarded the wishes of the people, their constituents, and we will know that Inwood is to be sacrificed to Mammon, as have other communities across our city.

DAVID DUBNAU

PHRI

225 Warren Street

Newark, NJ 07103

Telephone (office): 973-854-3400

Telephone (lab): 973-854-3402

*No more the drudge and idler
Ten that toil where one reposes
But the sharing of life's glories
Bread and roses, bread and roses
-James Oppenheim*

Inwood Rezoning -- VOTE NO. Please.

To The Honorable Members of the New York City Council:

I am writing to URGE the City Council to VOTE NO on the EDC's proposed Rezoning of Inwood.

- VOTE NO because: this diverse neighborhood, full of life and varied cultural expressions is at risk of becoming a valley of sameness;
- VOTE NO because: our fantastically mixed-use environment is at risk; small businesses, including bodegas and "mom & pop" shops (my neighborhood pharmacy for 20+ years, Dichter's Pharmacy) are threatened by the amendment to the plan that enables big box stores and nightclubs;
- VOTE NO because: the infrastructure in Inwood is so old and unreliable that it will be crushed by additional use of the kind expected in this development plan;
- VOTE NO because: there has been NO appropriate research into the possible harm which would be done to migratory birds and to all of the wildlife and the parks, by the shadows and height of the proposed 16 - 30 story buildings throughout the proposed zoning area;
- VOTE NO because: Zero consideration has been given to the historic sites, including the Seaman Marble Arch, the Native American and African American burial grounds;
- VOTE NO because: the neighborhood is 98% 8-story buildings and 30-story buildings have no place here;
- VOTE NO because: the Inwood Branch of NYPL deserves its own ULURP;
- VOTE NO because: I rent a non-stabilized unit in a co-op building and my already high rent will increase insanely;

My name is Martia Gordon and I have lived at 2 addresses in Inwood, northern Manhattan for 25 years. I reside currently at 1803 Riverside Drive, Apt. 5H, New York, NY 10034. Our daughter was born in in our apartment in Inwood (100 Arden Street), she attended Amistad Dual Language School (PS/IS 311) for nine years - Kindergarten through 8th Grade. I am on the Board of the RING Garden and am a Citizen Tree Pruner; I spend all of my free time in the garden or in Inwood Hill Park (sometimes The Cloisters, too!)

Thank you for your consideration. I sincerely HOPE THAT YOU VOTE NO.

Very truly yours,
Martia Gordon

Email: widatee@gmail.com
Home: 212-569-2030
Cell: 917-846-5012

Inwood Rezoning

As a resident of Inwood, I'm writing to voice my disapproval of the current rezoning plan. Inwood does not have the appropriate infrastructure to handle the current amount of residents, particularly in transportation.

In addition, the character and the neighborhood feel of this area would be given away to contractors and developers for little neighborhood gain. I urge the rejection of this plan.

Thank you,

April Davis

Inwood rezoning plan is bad planning--Vote No.

Good city planning should ensure that new development should target areas with good resources. Inwood has nice parks, but our existing public schools are poorly performing, with few exceptions, and a shocking number of recent residents are sending their kids out of district, to charter, or to private schools--there has been little study on this, and the half-measures suggested by Councilmember Rodriguez will not meaningfully address the existing systemic problems. In addition, the City's estimation of the transportation resources in Inwood is terribly wanting. The reality is that it takes forever to get anywhere, the buses are spotty, and the A train is unreliable. There is no plan to bring ferry service to the east side, by 9th or 10th avenue, or increase connections via bus / shuttle to Metro North. Without increased serious investment in schools and transportation, it is irresponsible of the City to plan for an influx of thousands of new residents.

Second, Inwood has been losing rent stabilized units at an alarming pace. Increased land values due to the rezoning will only exacerbate this, and the measures suggested thus far by the City do not sufficiently address the particular causes of destabilization in Inwood. Specific landlord tactics should demand a specific advocacy/public policy response.

The housing preservation issue in Inwood is that for years landlords have been abusing illegal or sketchy tactics to destabilize units, or file frivolous MCI increase claims, which are notoriously difficult to fight. For instance, Isham Court is a 150-unit building with a high percentage of stabilized leases that's one of those grand old buildings with an interior courtyard--the landlord "upgraded" the courtyard, and hit all the tenants with an MCI. There are high incentives in Inwood for landlords to maximize income, and since either tenants don't know their rights (or don't want to upset a landlord when they think they are getting "a deal"), or individual tenants don't have the ability to pay for counsel/are over income to qualify for free counsel, they end up giving up and being forced out, which just results in a 20% increase in the asking rent, on top of what the landlord was trying to charge the previous tenant. Landlords also tend to chop up those big Art Deco Inwood apartments into tiny rabbit warrens--appropriate for roommate suites, but not for raising a family (and they get the applicable rent stabilization increase for the "improvements"!). These particular tactics--as well as the prevailing practice of installing noxious ground floor uses--are specific to Inwood, and are not addressed in the 'certificate of no harrassment' legislation, or by "right to counsel", which is only available to individual tenants below the poverty line, and does nothing to tackle pervasively noxious tactics employed by a management company or landlord. The specific displacement issues in Inwood need to be tackled on a building-wide or portfolio-wide basis, and the City has no apparent plans to do so.

It is wrong for the City to exacerbate these problems by imposing a rezoning on the community, while at the same time insist that the band-aid and half-measures at their current disposal are all the City can do to ameliorate these problems. If the City cannot comprehensively address the existing housing preservation crisis in Inwood head-on, then it is irresponsible to make it worse by means of the rezoning.

Jaye Fox

Please vote "No" to Inwood rezoning plan

Dear Council Members,

Please vote "No" to the disastrous "Inwood NYC" rezoning plan. The proposed building heights do not fit in with the current architecture of the community. Increasing housing density to the degree proposed will put unsustainable pressure on public transportation and the environmental impact statement shows that the proposal will result in terrible traffic jams at intersections, creating a safety hazard. Additionally, there is not enough affordable housing in the proposal, speeding up gentrification.

The community has put together an alternative rezoning proposal, the Uptown United Platform. Please consider this as a proposal with true community input.

Thank you,

Shannon Wood
Isham St, NYC

Inwood Rezoning Plan

Dear Council Members:

I urge you to vote NO on the Inwood Rezoning Plan.

The rezoning plan will impact negatively on my housing financial situation as well as my daily quality of life in the neighborhood.

Please vote NO to this action so that Inwood remains affordable to the people who currently live here.

Sincerely,
Paula Korsko
235 Seaman Avenue
New York, New York 10034

Inwood Rezoning

I am writing to comment on the proposed Inwood NYC rezoning proposal currently before the City Council.

I am a fifteen-year resident of Inwood and am unequivocally OPPOSED to the EDC's plan. As has been amply expressed by my neighbors at every meeting regarding the rezoning, the proposed plan will do irrevocable harm to Inwood while providing a rather insignificant amount of so-called "affordable" housing—housing that will not be available to the Inwood residents who need it most because of the AMI requirements. Why is the City proposing to alter the very character of a wholly unique neighborhood in New York City for so little in return (no public parks, minimal waterfront access, no new precinct, no badly needed infrastructure improvements, no traffic mitigation measures)? Why must urban planning in New York always come at such a severe cost to its citizens? No one is saying that Inwood should not be rezoned; I for one am happy to see the formerly industrial parts of Inwood rezoned for residential purposes, for instance. But why is it so difficult to base any changes on the age-old premise "First, do no harm"? New York City's legislators could learn a lot from the Ancient Greeks.

I urge the Council, in the strongest possible language, to vote NO on this disastrous proposal and to support the Uptown United plan.

Sincerely,

Alexandra Anderson

Inwood rezoning - resident statement

To: New York City Council

Re: Rezoning proposal for Inwood

July 13, 2018

The disastrous plan to force rezoning on an unwilling neighborhood united in opposition is a travesty of the democracy which we supposedly enjoy as US citizens.

Our community has carefully studied and discussed each aspect of the Economic Development Corporation's plan, articulated precise objections, and proposed workable alternatives.

Instead of taking these inputs seriously, the City has bulldozed forward, even tossing in last-minute amendments that were never discussed in the endless "community consultation" meetings that are now revealed to be exercises in cynical Potemkin Village obfuscation.

While the City Council is right to consider the position of sitting members in matters relating to their districts, it is completely unacceptable for the Council to abandon its overarching mandate to serve the public interest in a matter of such gravity as rezoning in which the potential damage is vast and permanent. Our elected CM is not a feudal lord granted monarchical powers over his demesne; the Council must examine the facts independently of the wishes of a single individual.

I call upon the Council to resist the siren calls of developer largesse and preserve the last enclave of moderate-income residents of Manhattan.

Timothy Frasca

41 Park Terrace West B6

New York NY 10034

Inwood rezoning

To whom it may concern,

As a 30-year resident of Inwood, I am extremely concerned about the proposed rezoning of my beloved neighborhood. The other day, as I walked through the area I experienced the Inwood I know and love: The sky was open and the sun reached all parts of the avenues. I looked up and saw the magnificence of the Cloisters unchallenged by tall buildings. I passed street vendors selling their wares as they have done for decades. I heard three languages as I continued my errands, ending up, as I often do, at the Inwood library.

Three decades ago, I left the Upper West Side, having been born and raised there. I was priced out by gentrification. Even had I been able to afford living there, the diversity and vibrance of the neighborhood was replaced by a homogenous, economically privileged population. Everything that made the neighborhood special was lost. I worry that the same is planned for Inwood.

While I am a staunch supporter of affordable housing, I don't believe what we are being forced to accept here is in furtherance of that goal. This neighborhood could get behind truly affordable housing that is designed contextually with what makes Inwood so special. It is the concept of so many tall buildings, changing our landscape drastically, that spurs me to write this letter.

There is also infrastructure to consider. Subways are already packed by the time they reach the second stop on their trip downtown. We have experienced blackouts as a result of our antiquated grid. Parking has become increasingly difficult. There seems to be no mention of alleviation of these trouble spots. I am worried, also, by the description of the area by the Harlem River as under-utilized. The businesses that have flourished there for decades might disagree.

I wonder why, in the South Bronx where I work, there are 100% affordable housing units being built contextually within the neighborhood. So, simply asked, why there and not here?

And, finally, our library. Our library is a central part of life here in Inwood. I use it on a regular basis, both to take out books for myself and to tutor

young Inwood residents who need a step up. We have won awards and just renovated. And now the city want to sell it, leaving us with no library for the foreseeable future, and build in its place a building so out of place with its surroundings. Our children will have no safe haven (because that is what this library is for many students, especially at-risk middle school youth).

I am a life-long New York City resident. I love my city and I love my neighborhood. I am not against progress, per se. But huge developments that change the landscape of a vibrant, flourishing neighborhood with a rush to planning and minimal community input is not the way to a better city. We can do better. It is important that the City study carefully the impacts on our neighborhood of the proposed Inwood rezoning plan. Thank you for your attention,

Sauna Trenkle
25 Cumming Street
New York, NY 10034

To whom it may concern:

I am a resident of Inwood and have lived in the neighborhood for the past three years. I have very serious concerns about the proposed redevelopment in the area. Specifically, I think these areas should be taken into consideration:

1. Rezoning the 207-Broadway-Dyckman corridor for nightclubs sounds very reckless. I currently live on Broadway and 204th Street and while it is a busy thorough fare, the neighborhood is peaceful, quiet and safe at night. I fear allowing nightclubs will invite all sorts of unsavory activities, including loud noise into all hours of the night and other quality of life nuisances like trash, vomit, piss and fighting. I live here because it is one of the only affordable and family friendly areas in Manhattan and I see that at jeopardy.
2. Lifting the height restrictions throughout the neighborhood sounds like a disaster which will hand over one of the last affordable areas of Manhattan over to developers and gentrification. I could get on board with an idea like this except that based on my experience virtually no affordable housing will be added. Current "affordable housing" on the NYC Housing Connect website in Washington Heights are around \$2000/1 BR. That's crazy! And only going to embolden these landlords to raise rents. If there were proposals that had truly affordable housing and gave the ENTIRE new buildings over to affordable housing, then maybe you have a start, but that is not what is being proposed.
3. LASTLY, I HAVE SERIOUS CONCERNS ABOUT PUTTING ANY ADDITIONAL PEOPLE IN THE AREA WITHOUT ADDRESSING THE ATTRITION AND UNRELIABILITY OF THE SUBWAYS IN THE NEIGHBORHOOD. ON MY COMMUTE TO COLUMBIA WHERE I WORK, I GET ON THE TRAINS AT THE 6TH STOP ALONG THE 1 LINE AND THEY TRAINS ARE ALREADY FULL. THE A TRAINS BARELY RUN EVERY TEN MINUTES AND I OFTEN WAIT 20+ MINUTES FOR A TRAIN HOME ON WEEKDAY EVENINGS (I'M TALKING 8/9PM NOT 11PM, 12AM or 1AM). AND THAT'S **IF** THE TRAINS ARE RUNNING. I CURRENTLY CANNOT EVEN RELY ON THE TRAINS TO GET ME AROUND THE CITY ON NIGHTS AND WEEKENDS. THE A OR 1 HAS BEEN DOWN ENTIRE NIGHTS AND WEEKENDS FOR AS LONG AS I CAN REMEMBER TO THE POINT THAT I JUST ASSUME I AM TAKING AN UBER IF I WANT TO GO ANYWHERE ON THE WEEKEND. THAT IS CRAZY. I PAY CLOSE TO \$120/MONTH TO RIDE THE MTA AND BASICALLY THE MTA ONLY COMMITS TO GETTING ME TO WORK AND BACK. YOU CAN'T KEEP ADDING MORE HOUSING AND MORE PEOPLE WITHOUT PAYING FOR THE TRAINS. FIX THE TRAINS.

Sincerely,

Eric Meyer
Administrative Coordinator
Faculty of Arts and Sciences
Columbia University
535 West 116th Street
105 Low Memorial Library, MC 4311
New York, NY 10027
(212) 854-8908

Inwood Rezoning

To Whom It May Concern:

The proposal, as it exists, for rezoning Inwood is unacceptable and would cause harm to the residents of this neighborhood, the small businesses, the community, and the local environment. Among my major apprehensions regarding the rezoning and development of Inwood are those that pertain to the natural environment, particularly the parks, shoreline, and waterways.

Having been to a number of the meetings that were open to the public, I will note that information was presented on more than one occasion in a manner that was misleading. I am skeptical that the City would protect local residents from harassment by landlords who seek to push out locals and capitalize on this kind of development. The EDC seems unwilling to value the input from the community and its representatives on this matter, which is deeply alarming.

Our Community Board did not support this rezoning plan, and Borough President Gale Brewer directly opposed the proposal, stating that the city cannot "...expect a neighborhood to accept a rezoning that raises the specter of displacement in the short and medium term by telling the community that it is not nearly as bad as what is likely to happen" in the long run.

Uptown United, representing a coalition of groups and residents in our community, has put forth a very thoughtful and reasonable alternative to the current proposal. It can be found here: <https://www.documentcloud.org/documents/4384164-Uptown-United-Platform-Feb-21.html>

The speed at which this rezoning and development plan is being fast-tracked makes one wonder if it is more indicative of political ambition than it is of a real desire to heed the wishes of the community.

As a long-term resident of Inwood, I urge you to vote NO on the rezoning proposal.

Sincerely,
Sky Pape

Sky Pape
New York, NY 10034
646-306-5791

Please vote no on EDC Inwood Rezoning plan

Dear councilmember,

I am writing to ask you to oppose the EDC's proposed Inwood rezoning plan. Many of us in the neighborhood believe that the current proposal:

- Permits too much growth in the neighborhood, including adding more people than the infrastructure can support,
- Permits extremely high-rise buildings out of character for the neighborhood,
- Does not include enough affordable housing or protections for current rent-stabilized housing,
- Does not include enough protections for the small businesses that provide an important foundation for our neighborhood.

The EDC plan is opposed by Uptown United, Manhattan Community Board 12, and Manhattan Borough Council President Gail Brewer. Please listen to your voters and oppose this unpopular plan.

Jessica Ancker
Registered voter
270 Seaman Avenue, Inwood

Inwood NYC Rezoning

For years, Community Board 12 has called for contextual zoning in the district and specifically included the area south of Dyckman in the ‘target area’ considered at highest risk for exploitative development (CB 12 Contextual Zoning Resolution; October 2012, rev. July 2016). From Day 1, however, the City has ignored this recommendation and has almost completely excluded the Fort Tryon East area of the neighborhood. Over many months of consistent requests at community engagement events, public meetings, and through written inquiries, NYC EDC continued to stonewall requests to extend the rezoning area to include our part of the neighborhood — even in light of the fact that the highly contentious Sherman Plaza luxury development plan that inflamed massive protests in the neighborhood and resulted in a city council vote against an up-zoning proposal at that site, is in our part of the neighborhood! After ignoring our requests for months, NYC EDC then shifted arguments, telling us that it was ‘too late’ or ‘too expensive’ to change the parameters of the rezoning area and that we were simply out of luck. This is reflective of NYC EDC’s overall approach to ‘community engagement,’ which has been insincere and ineffective.

The potential impact of heightened displacement of existing tenants and loss of rent-regulated units in this area is tremendous, especially due to the high number of rent-stabilized tenants here who are paying a preferential rent and our proximity to the ‘Commercial U’ area in the Inwood NYC plan, and it cries out for the protection against the potential of a large influx of market-rate housing that only contextual zoning can provide. Inwood has the largest stock of rent-regulated housing of any neighborhood in the city; any rational affordable housing initiative must have as its first priority the preservation of those existing units. Unfortunately, the Inwood NYC plan rejects this premise, failing to learn the lessons of previous rezonings in which the impact of large-scale new market-rate development has devastated working class neighborhoods and led to hyper-gentrification and massive displacement. Given the economic demographics of Inwood, MIH is not an efficient mechanism for affordable housing creation because most Inwood residents make too little to qualify for the ‘affordable’ apartments in new developments. In short, the Inwood NYC plan asks the community to accept a small number of new ‘affordable’ units that most residents will not be able to apply for in exchange for thousands of new market-rate units whose higher rents will affect each and every current resident of the neighborhood. We reject this irrational, dangerous, and abusive mishandling of our community and of the city’s larger affordable housing crisis.

Other reasons for our concern about the exclusion of Inwood south of Dyckman Street from contextual zoning protections include:

- The particular concentration of landlord harassment (highlighted by the class action settlement against Pinnacle) and displacement (as evidenced by the numerous buildings that have lost a majority of their rent-stabilized units in the last ten years) in this area.
- The high number of rent-stabilized tenants on a preferential rent lease in the area, making hundreds of families extremely susceptible to displacement and potential homelessness
- The existence of numerous ‘soft sites’ (such as 4650 Broadway and the parking lot at the intersection of Broadway and Nagle) that are likely to be or have already been targeted by developers for massive development.

- The threat to small businesses in the area, many of which are already struggling and would face tremendous new pressures from out-of-context development.
- Potential negative impacts on the local parks, both environmentally and in terms of access.
- Negative environmental and health impacts resulting from development of soft sites with history of industrial uses (especially those adjacent to schools, parks, and playgrounds).
- Increased pressure on crumbling infrastructure, which is already fraying under the pressure of the existing population.
- Disproportionate impact of higher cost of living on senior population (such as residents of Wien House on Nagle Ave.)
- Increased pressure on local schools, which are already over-crowded

Thank you for reading,
Abigail Teller
Washington Heights Resident

Inwood Rezoning

Dear Councilmembers, I am writing to oppose the plans to rezone Inwood. Many residents will be displaced with no where affordable to go. As a resident of 10 years, I am deeply opposed to the proposal. Parking is already a nightmare, and the subways are overcrowded . What are the solutions to this ? Also, the library is an integral part of the community, and should not be downsized or closed for two years.

Mary Barton
235 Seaman Ave.

Inwood Rezoning Proposal

Please vote NO on this destructive, ill-conceived proposal. Hundreds of people from all sectors of the population voiced their opposition at the community board and Borough President hearings. The admirable goals of affordable housing, etc. can be met without imposing the greatest increase in density and population of any rezoning proposal. This gift to developers will harm rent-regulated tenants, local businesses, and the rest of this close-knit community.

Why should a brutal assault on the community be a prerequisite for investment that would just be normal in other parts of the city?

Andrea Kornbluth
Inwood resident

testimony for Inwood

I dont agree with Inwoods rezoning plans.

Hamlin Gomez

Mary Illes Inwood resident

Please vote no on the rezoning. This neighborhood will be ruined, the trains cannot handle any more riders, the schools are underfunded, and the traffic from LaMarina is already a horror.

Do not ruin this wonderful neighborhood.
Vote no.

Thank you, Mary Illes

inwood rezoning plan testimony

Dear Councilmembers,

I have lived in Inwood for 16 years. I live in a rent stabilized apartment, and am one of the roughly 30 percent of Inwoodites who pay “preferential” (below the legal rent stabilized amount) rent and is at risk for large rent increases because of this rezoning plan.

I urge you to vote no on this plan. It is deeply flawed, and its many negative impacts are either ignored or downplayed by the city. I will only mention a few of them below.

Why do these rezonings with massive upzoning only happen in less well off neighborhoods, where the residents are primarily nonwhite? Why does the city tie modest investments in parks, etc in these neighborhoods to these rezonings? It seems racist and classist...ie the poorer folks can just make way for the more well off..and probably white..gentrifying class. Please learn from Williamsburg rather than repeat it.

This plan will cause much higher displacement of local residents and local businesses than the EDC claims.

The commercial U is totally inappropriate for inwood and must go. It is out of scale with the adjacent streets, plus it places many local businesses (in existing 1-2 story buildings, such as local grocery stores and other retail) at risk for tear down. According to Gale Brewer, the number of businesses along the commercial U that would be displaced is 6 times higher than what the EDC predicts (147 vs. 26). How is it helping to preserve local businesses by amending the zoning along Dyckman to allow big box stores, under the guise of allowing more commercial development? And what will happen to the residents who live in the apartment buildings on those streets if their buildings get torn down for mostly luxury housing or an office building?

The city has a history of underestimating the number of new units built (think Williamsburg or Long Island City), so how can we believe the number (4350 units) that

they provide? With the proposed plan, 70% of those new units would be market rate. This would place immense pressure on the existing rent stabilized housing stock here. As you know, Inwood has the most rent stabilized units in the city. It's irresponsible for a plan which seeks to provide a small amount of "affordable" housing (so the mayor and other politicians can say they created affordable housing) to do so by plopping large amounts of market rate housing into such a neighborhood. This will have a net effect of reducing the available rent stabilized (ie actual affordable for residents) units. Meanwhile, the majority of the new "affordable" units built would not be affordable to a typical Inwood resident. Using MIH zoning in a lower income neighborhood such as Inwood is absurd. The best way to preserve the existing affordable housing stock here..is to build as few market rate apartments as possible.

Visually, Inwood doesn't have a lot of tall buildings, it is mostly 6-8 story apartment buildings. It is inappropriate design-wise to add 20-30 story buldings (R8/9) here. This sort of zoning doesn't occur north of central park or the GW bridge, and will tower above what is here now.

Lastly, why was the library redevelopment included this plan? Was it to prevent community opposition from succeeding? It should have a separate ULUURP process and should not be upzoned. there are other sites in the neighborhood which could provide the affordable housing without tearing down the library (and shrinking it..just like with donnell and other branches)

Please vote no on this plan.

Sincerely,

Suzanne Malitz
49 Seaman Ave
ny ny 10034

Inwood Rezoning

Dear Ms. Lloyd,

I am writing to express my opposition to the proposed rezoning in Inwood.

I have lived in Inwood since 1997 and have 3 children, 2 of whom are still attending school in the district.

In fact, I wonder what would happen to ps/ms 278 under the rezoning. It is on land leased, not owned, by the DOE, and if it is rezoned I imagine the owners might prefer to sell to a developer and build a tower. By the way 278 is a thriving, neighborhood school.

We don't have enough subway or bus service for the people who live here now. How could adding towers full of people help?

Inwood has middle class housing, in fact it is just about the only place in Manhattan that can say that.

I suspect that if the mayor put some effort into improving schools in the Bronx those neighborhood's would flourish. There are tons of gorgeous apartments there, but the schools are lousy.

I grew up on the Upper West Side, which is like a mall now. Inwood is a place where a small business owner can build a life. Why would we crush that and bring in big box stores?

Why would you block the river views of the low income people with a tower for the rich (yes, I know there would be some middle-class apartments... I wonder if they would have to go in a separate

entrance?) Our library is wonderful, it is used by all ages, colors, income brackets. It has won awards. In ten years, if need be, it can expand upward. If you squeeze it into the lobby of some building it can't ever grow.

There is an alternative proposal on the table, please consider that. It has been worked on by people who live in and know the neighborhood.

People are upset. I don't know one person in Inwood who supports this plan, but most people are too busy to write.

From what I can tell only those who stand to profit financially support this plan.

Please don't pass this, Inwood is a thriving, diverse neighborhood. We don't need or want this development.

Sincerely,

Helen Amanda Sullivan

Academy Street

Inwood Rezoning - Please Vote "No"

Hello,

I hope this message finds you well. I am writing to you as a resident of Inwood. I want to strongly encourage you to vote "no" on the Inwood Rezoning Plan.

My husband grew up in Inwood, and we truly love and appreciate the community. After years of searching, we were finally able to assist my mother-in-law in moving back to the neighborhood this past November. She is disabled and has custody of two of our nephews, ages 5 and 11. We are deeply concerned about how rezoning, and subsequent increases to neighborhood rents could both result in the loss of current housing, and in the inability to secure new housing in the neighborhood.

If existing housing is demolished so as to build new "affordable" housing, the present residents will be displaced in the interim, and have no guarantee of placement in the new housing when construction is complete. Low-income families who meet their housing costs with the assistance of Section 8 vouchers will be particularly vulnerable to displacement in such situations. Furthermore, it is frequently the case that affordable units in new construction are not actually affordable to the individuals who are displaced by said construction.

We know there are many families in Inwood situated similarly to ours, and have seen how promises of affordable housing, akin to those proposed in the current rezoning plan, have actually resulted in the extensive displacement of families throughout Brooklyn.

I sincerely hope you will vote "no" on the rezoning plan. Thank you for your time and consideration.

Sincerely,
Katharine Kuhl-Adorno

Inwood rezoning-please, no!

Please block the rezoning. This is one of the last neighborhoods in Manhattan that a family can still manage to live in. Please focus on improving the community we have, not ruining it by speeding gentrification! We don't need more empty storefronts and empty luxury apartments!

*** For years, Community Board 12 has called for contextual zoning in the district and specifically included the area south of Dyckman in the 'target area' considered at highest risk for exploitative development (CB 12 Contextual Zoning Resolution; October 2012, rev. July 2016). From Day 1, however, the City has ignored this recommendation and has almost completely excluded the Fort Tryon East area of the neighborhood. Over many months of consistent requests at community engagement events, public meetings, and through written inquiries, NYC EDC continued to stonewall requests to extend the rezoning area to include our part of the neighborhood — even in light of the fact that the highly contentious Sherman Plaza luxury development plan that inflamed massive protests in the neighborhood and resulted in a city council vote against an up-zoning proposal at that site, is in our part of the neighborhood! After ignoring our requests for months, NYC EDC then shifted arguments, telling us that it was 'too late' or 'too expensive' to change the parameters of the rezoning area and that we were simply out of luck. This is reflective of NYC EDC's overall approach to 'community engagement,' which has been insincere and ineffective.

*** The potential impact of heightened displacement of existing tenants and loss of rent-regulated units in this area is tremendous, especially due to the high number of rent-stabilized tenants here who are paying a preferential rent and our proximity to the 'Commercial U' area in the Inwood NYC plan, and it cries out for the protection against the potential of a large influx of market-rate housing that only contextual zoning can provide. Inwood has the largest stock of rent-regulated housing of any neighborhood in the city; any rational affordable housing initiative must have as its first priority the preservation of those existing units. Unfortunately, the Inwood NYC plan rejects this premise, failing to learn the lessons of previous rezonings in which the impact of large-scale new market-rate development has devastated working class neighborhoods and led to hyper-gentrification and massive displacement. Given the economic demographics of Inwood, MIH is not an efficient mechanism for affordable housing creation because most Inwood residents make too little to qualify for the 'affordable' apartments in new developments. In short, the Inwood NYC plan asks the community to accept a small number of new 'affordable' units that most residents will not be able to apply for in exchange for thousands of new market-rate units whose higher rents will affect each and every current resident of the neighborhood. We reject this irrational, dangerous, and abusive mishandling of our community and of the city's larger affordable housing crisis.

*** Other reasons for our concern about the exclusion of Inwood south of Dyckman Street from contextual zoning protections include:

- The particular concentration of landlord harassment (highlighted by the class action settlement against Pinnacle) and displacement (as evidenced by the numerous buildings that have lost a majority of their rent-stabilized units in the last ten years) in this area.
- The high number of rent-stabilized tenants on a preferential rent lease in the area, making

hundreds of families extremely susceptible to displacement and potential homelessness

- The existence of numerous ‘soft sites’ (such as 4650 Broadway and the parking lot at the intersection of Broadway and Nagle) that are likely to be or have already been targeted by developers for massive development.
- The threat to small businesses in the area, many of which are already struggling and would face tremendous new pressures from out-of-context development.
- Potential negative impacts on the local parks, both environmentally and in terms of access.
- Negative environmental and health impacts resulting from development of soft sites with history of industrial uses (especially those adjacent to schools, parks, and playgrounds).
- Increased pressure on crumbling infrastructure, which is already fraying under the pressure of the existing population.
- Disproportionate impact of higher cost of living on senior population (such as residents of Wien House on Nagle Ave.)
- Increased pressure on local schools, which are already over-crowded

Lydia Carr

Please vote no on the rezoning

I'm writing to ask the city council to vote no on the proposed rezoning in Inwood. I've lived in this neighborhood for almost 10 years and I can tell you that all of the people I know here are against the rezoning. Please represent us.

Thank you,

Rachel Hundert

Inwood rezoning

Dear Councilmember Moya,

I am an Inwood resident living in 10 Park Ter E. I unfortunately could not make it to the hearing this week, but I wanted to write to say that I am strongly *against* the Inwood rezoning proposal. Thank you very much for your time.

Best regards,
Claire Zukowski

inwood nyc rezoning

I'm writing to ask that the rezoning plans for the Inwood area of northern Manhattan be shot down. I'm a resident of 32 years and over that time I've seen the increase in population that has pushed the 'rush hour' crush on subway trains from ending around 7:30 to ending around 9:30. Apt rents have gone from a few hundred dollars to up to \$2500 for a one bedroom. If the average income of area people is \$36K, how can families afford that???

Parking on the street is nearly impossible and nothing has been done to increase bus routes or up date utilities like the electrical grid, yet the population density has increased.

Adding population will only make life here worse and force those of us who cannot afford thousands of dollars on rent out to - where??

For me it might be out of state entirely

Michala Biondi

Dongan Place resident

micalaquendi@gmail.com

Spirituality is what we do with the unrest in our souls. Thomas Merton

Say NO to Inwood NYC Rezoning Plan

Greetings,

I am a Inwood resident and I want the city council to say NO to the disastrous rezoning plans.

--

Best regards,
Solenny Castillo

Education happens when we connect what we learn in the classroom with the world around us. -Yara Shahidi

Inwood refining

I am a long time resident of Inwood and also a local business owner. I would urge the council to vote no on the city plan to rezone Inwood. I do support the alternative plan presented by neighborhood groups. Thank you for your time and consideration

Rob Kleinbardt
New Heights Realty
634 West 207 Street
New York, NY 10034

Inwood rezoning

Good evening, Sir or Madam,

I live on the corner of Riverside Dr and Staff St, just next to the intersection with the Henry Hudson Parkway. I have lived here for 2 years, and previously I lived at 12 Dongan Place for over 10 years.

From my living room window, I can see stand still traffic most warm evenings, as the masses are coming to La Marina. Now La Marina is nice— decent food, a bit expensive— but it about the ambiance. Getting to La Marina is a nightmare. Coming home from my own plans on an evening that La Marina is open is a nightmare. Traffic is standstill. NYPD have barricaded most streets. Staff St is one way towards Inwood Hill Park, but on nights that it is barricaded, many people go the opposite way, ignoring signage and nearly causing multiple accidents as they try to cross the meridian (causing damage to their car) or swerving to get on the HHP going south bound.

The traffic coming northbound off the HHP to Dyckman is often stand still, with loud honking and blaring music. This is not currently being addressed yet continually impacts my quality of life. And when the traffic isn't snarled, State troopers spend all night pulling people over with their megaphone blaring directions most of the night. It is unpleasant.

Additionally, looking at the proposal for rezoning, we see the proposal would create taller buildings, with more people and more traffic. Rents is already too high here, with my rent going up \$200/year (\$2800 currently for a 3 br). I am a well-paid city employee (NYC school principal) and I struggle to live in a community near my school due to the rising costs of living in the city. I am committed to this city and have been for nearly 18 years as an educator. I do not want to have to live in Westchester or Long Island to afford life. My daughters go to city schools (HS for Fashion and Columbia Secondary) and they would be devastated to leave.

We enjoy our community as it is currently structured. Turning it into the upper-upper-West side is not appealing to our way of life as NYers.

I humbly submit this testimony to you. Should you have questions or wish to discuss it further, my phone is +19175154074.

Best regards,

Jaime Dubei

Vote NO on Inwood NYC Rezoning

To Whom It May Concern:

I am an Inwood, NYC resident and I request that the City Council vote NO on the Inwood NYC rezoning plan.

Best,

Tom Burns
Inwood, NYC

My name is Ted Gallagher, Esq. I have resided in Inwood at 1793 Riverside Drive, Apt 4-C (corner Henshaw St.) for the past 35 years. I have a master's degree in public policy from the Graduate Center of the City University of New York, and a law degree from Brooklyn Law School. I am a retiree from 31 years of service as a New York City municipal employee, the last 17 years of which were as Senior City Planner in the New York City Department of Housing Preservation and Development (HPD), Office of Intergovernmental Affairs.

My comments deal specifically with my block, bordered by Staff St.; Henshaw St.; Dyckman St.; and Riverside Drive.

Let Stand the Existing Zoning Designation for the South Side of Dyckman Street, West of Seaman Avenue

Henshaw Street is effectively a service road for the Henry Hudson Parkway. Drivers use it to avoid the Henry Hudson Bridge toll.

Even without the proposed zoning changes that could lead to five additional nine-story apartment houses along Dyckman Street west of Seaman Avenue, the noise and traffic congestion today on Henshaw Street is a grave nuisance. Henshaw Street is a choke point into the neighborhood; any additional traffic in this area will only degrade the quality of life for the existing residents along Riverside Drive.

[Years ago the NYC Board of Education presented the neighborhood with a proposal to build a middle school at the old bakery site, at the southwest corner of Henshaw Street and Dyckman Street. The public hearing was attended by well over 1,000 residents from all over Inwood; virtually all the speakers condemned the plan, for the reasons cited above. The proposal was withdrawn.] Massive up-building of this fragile strip, as you propose, would only bring the same added gridlock and misery to the area that led us to oppose the school project.

The proposed zoning could also very well lead to the loss of the parking garages along Dyckman Street, between Henshaw Street and Payson Avenue. These resources are treasures in our community. Please study the impact that hundreds of additional cars needing street parking would have on the quality of life for residents of Riverside Drive.

The commercial strip along the south side of Dyckman Street, west of Seaman Avenue, is a vital part of the community and should be preserved. Few Manhattan neighborhoods have a first-class bike shop; a gas station; and a car wash, all thriving. These businesses are long-standing and provide sorely needed employment. There is also a Manhattan Mini-Storage

facility on this strip, as well as a costume jewelry manufacturer, not to mention the massive parking garages that so effectively relieve parking congestion in the neighborhood. Preserving this commercial presence not only brings vitality to the community; it also tamps down the infrastructure demands that would ensue from the creation of many hundreds of new residential apartments. At nights and weekends, and seasonally during warm weather, the pedestrian traffic and roaming car traffic along this Dyckman Street strip increases exponentially. The Marina night club on Dyckman Street and the Hudson River attracts so many cars that Riverside Drive and Henshaw Street are grid-locked, sometimes for hours. The resultant horn-blowing and fighting are unbearable. Creation of new housing here would only add new burdens that are unfair.

Rezoning of Dyckman Street west of Seaman Avenue for residential housing would be a mistake. Even if the newly built housing from rezoning were *free*, the residents of the surrounding apartment houses would not want it, because it would degrade the already precarious quality of life we now face every day. For the above reasons, please let stand the existing zoning designation for the south side of Dyckman Street, west of Seaman Avenue.

THE COUNCIL
THE CITY OF NEW YORK

Inwood Rezoning

Appearance Card

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

in favor in opposition

Date: July 10/2018

(PLEASE PRINT)

Name: Ana Opocco

Address: 926 Riverside Drive, 10032

I represent: Northern Manhattan Not 4 Sale

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: Luisa Perez

Address: _____

I represent: _____

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: Laura Penaranda

Address: 235 Wadsworth Ave #4C

I represent: NMN45 + Met Council on Housing

Address: _____

Inwood

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: Marshall Douglas

Address: _____

I represent: _____

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: 7/10/18

(PLEASE PRINT)

Name: LESLIE CARABALLO

Address: 570 W. 204 St., 3F

I represent: Community (RESIDENT)

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Inwood
Rezoning

Appearance Card

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

in favor in opposition

Date: 7/10/18

(PLEASE PRINT)

Name: Arabelis Liriano

Address: _____

I represent: _____

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

fezaniaty

Appearance Card

[]

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: DANA HANCHAARD

Address: 116 SPANAN AVE #8T

I represent: SACRED PLACES + Fresh water sites

Address: IN INWOOD

INWOOD

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

[]

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

in favor in opposition

Date: 7/10/18

(PLEASE PRINT)

Name: ARON DROZCO

Address: 147 PERSHORE AVE, VA 14144

I represent: Altagracia Faith + Justice Works

Address: 91 Arden Street, NY, NY 10040

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: Jeanie DUBNAE

Address: 800 PSD

I represent: RENO, MN 45

Address: _____

THE COUNCIL
THE CITY OF NEW YORK Inwood

Appearance Card

[]

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

in favor in opposition

Date: 7/10/18

(PLEASE PRINT)

Name: ZOYA KOCUR

Address: 50 PARK TERRACE E, #3D, NY NY

I represent: from NMN45 and Uptown United 10034

Address: various community vendors - no permanent space

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: SARA A. FISHER

Address: 603 KATH STREET

I represent: _____

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: ELUIS MENEZES

Address: 221 SEAMAN AVG. N.Y. N.Y. 10034

I represent: _____

Address: _____

Inwood

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: Ana Orozco

Address: 920 Riverside Drive NYN410032

I represent: Northern Manhattan NDF for Sale

Address: _____

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

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

in favor in opposition Library Sale

Date: 07/10/18

(PLEASE PRINT)

Name: Michael D.D. White

Address: 62 Montague Street Bklyn, NY 11201

I represent: Citizens Defending Libraries

Address: 62 Montague Street Bklyn, NY 11201

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: Vince Boudreau

Address: City College of NY 100 Orville Terrace

I represent: City College of NY

Address: 160 Convent Ave, NY, NY

**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: 7/10/18

(PLEASE PRINT)

Name: Obed Fulcar

Address: _____

I represent: Sherman Creek

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: 7/10/18

(PLEASE PRINT)

Name: Roland Lewis / Jose

Address: _____

I represent: Metropolitan Waterfront 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: 7/10/18

(PLEASE PRINT)

Name: Nelson Castro

Address: _____

I represent: Agenda Dominicana

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: 7/10/18

(PLEASE PRINT)

Name: Will Tavaréz

Address: _____

I represent: Agenda Dominicana

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: 7/10/18

(PLEASE PRINT)

Name: Richard Garcia

Address: _____

I represent: Agenda Dominicana

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: 7/10/18

(PLEASE PRINT)

Name: Carlos Diaz

Address: _____

I represent: Agenda Dominicana

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: 7/10/18

(PLEASE PRINT)

Name: Peter Farkas

Address: _____

I represent: Agenda Dominicana

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: 7/10/18

(PLEASE PRINT)

Name: Diosmary Perez

Address: _____

I represent: Resident

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: 7/10/18

(PLEASE PRINT)

Name: Joaquin Valasquez

Address: _____

I represent: Resident

Address: _____

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

THE COUNCIL
THE CITY OF NEW YORK

Inwood

Appearance Card

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

in favor in opposition

Date: 07/10/18

(PLEASE PRINT)

Name: JAMES PATCHETT

Address: PRESIDENT & CEO NYCEDC

I represent: _____

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Inwood

Appearance Card

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Cecilia Kushner

Address: Senior Vice President NYCEDC

I represent: _____

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Inwood

Appearance Card

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: MARIA TORRES SPRINGER

Address: COMMISSIONER HPD

I represent: _____

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: GREGG BISHOP

Address: COMMISSIONER SBS

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Inwood Library

Appearance Card

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

Date: _____

(PLEASE PRINT)

Name: Yvonne Stennett

Address: _____

I represent: CLOTH

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Inwood Library

Appearance Card

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

Date: _____

(PLEASE PRINT)

Name: Iris Weinshall

Address: _____

I represent: NYPL

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

[]

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

Date: _____

(PLEASE PRINT)

Name: Danita Nichols

Address: _____

I represent: NYPL

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

[]

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

Date: _____

(PLEASE PRINT)

Name: Cassandra Louis

Address: _____

I represent: Children's Village

Address: _____

~~XXX~~
GROUP 4/4
COMMUNITY BOARD 12, M

THE COUNCIL
THE CITY OF NEW YORK

1PM HEARING

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____
(SEE RESOLUTION) in favor in opposition

Date: 7/10/2018

(PLEASE PRINT)

Name: EBENEZER SMITH - DISTRICT MANAGER

Address: COMMUNITY BOARD 12, MANHATTAN 530 W. 166 ST NY 10032

I represent: CB 12, M

Address: 530 W. 166 ST - SUITE 601 NY 10032

THE COUNCIL
THE CITY OF NEW YORK

Inwood Hearing

Appearance Card

[]

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

in favor in opposition

Date: 7/10/18

(PLEASE PRINT)

Name: Chris Nickell

Address: _____

I represent: Northern Manhattan is Not for Sale

Address: Inwood

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: 07/10/2018

(PLEASE PRINT)

Name: Teresa J. Flange

Address: 193 Maple Avenue

I represent: Imperial as a resident, Ave Maria as a resident, 3rd grad

Address: where I live

THE COUNCIL
THE CITY OF NEW YORK

Inwood

Appearance Card

[]

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Iris Weinsahl

Address: COO, New York Public Library

I represent: _____

Address: _____

INWOOD
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: 7/10/18

(PLEASE PRINT)

Name: Charlie Reynolds

Address: 254 W. 31st Street 10th Fl

I represent: New York Restoration Project

Address: 130 Post Ave.

INWOOD
REZONING
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: 7/10/18

(PLEASE PRINT)

Name: EM HIRSCH

Address: _____

I represent: NMN4S

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: 6/10/18

(PLEASE PRINT)

Name: Eligio Reynolds

Address: 256 WADSWORTH AVE

I represent: Washington Heights Tennis Assoc

Address: 256 WADSWORTH 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: _____

(PLEASE PRINT)

Name: Ulises NOBOGA
Address: 17 Ft George Hill apt 11d
I represent: BAMES @ USA Volleyball
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: Ava Farkas
Address: _____
I represent: Met Council on Housing
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: July 10th, 2018

(PLEASE PRINT)

Name: OSADRIS FLORES
Address: Bykman Inwood
I represent: the entire community
Address: Uptown!

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. Inwood Res. No. _____

in favor in opposition

Date: 7/10/18

(PLEASE PRINT)

Name: Ellen Osuna

Address: 73-83 260th St Glen Oaks NY 11004

I represent: Self / someone who loves NYC

Address: _____

**THE COUNCIL Inwood
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: Brian Cook

Address: _____

I represent: Scott M. Stringer, NYC comptroller

Address: 1 Centre St 5th Fl

**THE COUNCIL Inwood
THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: 7/10/18

(PLEASE PRINT)

Name: Robert Joseph

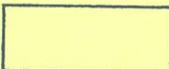
Address: 488 Madison Ave

I represent: Municipal Art Society of NY

Address: _____

THE COUNCIL *INWOOD*
THE CITY OF NEW YORK

Appearance Card



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

in favor in opposition

Date: 7/10/2018

(PLEASE PRINT)

Name: THOMAS LEWIN

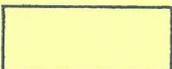
Address: 50 PARK TERRACE EAST

I represent: _____

Address: _____

THE COUNCIL *INWOOD*
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: Phil Simpson

Address: 101 Cooper St, 5N 10034

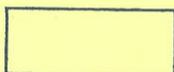
I represent: Uptown United & Save Inwood

Address: 101 Cooper 10034

Library

THE COUNCIL *INWOOD*
THE CITY OF NEW YORK

Appearance Card



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

in favor in opposition

Date: 7/10/18

(PLEASE PRINT)

Name: NEAL H. HURWITZ

Address: 610 W. 115 ST. 10025

I represent: CFS, INC.

Address: 610 W. 115 ST.

**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: 10 July 18

(PLEASE PRINT)

Name: Lorris Ritter, Elizabeth

Address: 340 Haven Ave., #25 10033

I represent: CB12 M

Address: 530 W 166th St. NYC 10032

**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: Omar Soriano

Address: 530 West 45th Street

I represent: _____

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: 7-10-18

(PLEASE PRINT)

Name: Rafael Reyes

Address: 423 West 203rd St

I represent: Business Owner

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: JANET SOLESKY

Address: 4761 B'way 31st

I represent: _____

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: BILL MURAWSKI

Address: 530 W. 50th ST

I represent: self

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Josmar Rojas

Address: 19 Vermilyea ave - # 3C New York, NY

I represent: Inwood residents

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: 7/10/18

(PLEASE PRINT)

Name: Gale Brewer (MSP)

Address: 1 Centre St

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Inwood

Appearance Card

[]

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Jennifer Hong

Address: _____

I represent: Edison Properties

Address: 100 Wash. St.

**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: 7.10.18

(PLEASE PRINT)

Name: Katie Moore

Address: 707 8th Ave NY NY 10036

I represent: New York Hotel Trades Council

Address: 707 8th Ave NY NY 10036

Inwood
Rezoning

**THE COUNCIL
THE CITY OF NEW YORK**

7.10.18

Appearance Card

[]

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

in favor in opposition

Date: 7.10.18

(PLEASE PRINT)

Name: Kirsten Theodos

Address: 323 E 14th St apt 17k

I represent: Human Scale NYC

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Inwood
Rezoning

Appearance Card

[]

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Lynn ELISWORTH

Address: 165 DUANE

I represent: Alliance for a Human Scale City

Address: www.humanscale.nyc

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

Inwood

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Abel Rodriguez

Address: 4963 Broadway 10034

I represent: Asociacion Restaurantes NY

Address: Federal Emserners Ass

Podar Hispano TV

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

207th Street
Sherman
Creek

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: 6/10/2018

(PLEASE PRINT)

Name: James Cataldi

Address: ~~49 Sherman Ave~~ 49 Sherman Ave
Apt. at 1634

I represent: Sherman Creek

Address: 207th Street

INWOOD

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: 7/11/2018

(PLEASE PRINT)

Name: Laurie Tobias Chen

Address: For Congressman Spillat

I represent: 500 West 1st Ten

Address: New York, N.Y. 10024

INWOOD

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 42112 Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Bennett Melka

Address: 4701 Broadway #42

I represent: Save Inwood Library

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Inwood Rezoning

Appearance Card

[]

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

in favor in opposition

Date: 7/10/18

(PLEASE PRINT)

Name: RITA GORMAN

Address: 900 W 190 ST.

I represent: NORTHERN MANHATTAN NOT FOR SALE

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

INWOOD

Appearance Card

[]

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: TED FREED

Address: 85 Seaman Ave 4A, NYC

I represent: _____

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

*1:30
Inwood
Rezoning*

Appearance Card

[]

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

in favor in opposition

Date: 7/10/18

(PLEASE PRINT)

Name: David Schwartz

Address: 1399 Franklin Ave, Grubnicity

I represent: Flair Beverage

Address: 3857 9th Ave, NY 10034

THE COUNCIL
THE CITY OF NEW YORK

1:30
Inwood
Rezoning

Appearance Card

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

in favor in opposition

Date: 7/10/18

(PLEASE PRINT)

Name: Paul Gragliardi

Address: 3857 9th Ave. NY 10034

I represent: Flair Rev.

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: 07/10/18

(PLEASE PRINT)

Name: Karla Cruz

Address: 266 W 37th Street

I represent: Laborers Union

Address: 266 W 37th Street

THE COUNCIL
THE CITY OF NEW YORK

Inwood
Rezoning

Appearance Card

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

in favor in opposition

Date: July 10

(PLEASE PRINT)

Name: Nancy Preston

Address: 17 Seaman Ave

I represent: Moving Forward Unions

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

*Inwood
Region*

Appearance Card

[]

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Pilar Dejesus

Address: _____

I represent: East Harlem community / Urban Justice Center

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Inwood Region

Appearance Card

[]

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: ROBERT JACKSON

Address: _____

I represent: NMN4

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Inwood Region

Appearance Card

[]

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Johanna Garcia

Address: _____

I represent: Northern Manhattan is Not for Sale

Address: _____

THE COUNCIL *Inwood Rezoning*
THE CITY OF NEW YORK

Appearance Card

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

in favor in opposition

Date: 7/10/2018

(PLEASE PRINT)

Name: Cassandra E. Louis

Address: 1 Echo Hill, Dibbs Ferry, NY 10522

I represent: The Children's Village

Address: _____

THE COUNCIL *207th Street Sherman Creek*
THE CITY OF NEW YORK

Appearance Card

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

in favor in opposition

Date: 7/10/2018

(PLEASE PRINT)

Name: Bill Bollinger

Address: _____

I represent: Maddal Equities

Address: 207th street 9th Ave, Manhattan

THE COUNCIL *207th Street Sherman Creek*
THE CITY OF NEW YORK

Appearance Card

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

in favor in opposition

Date: 7/10/2018

(PLEASE PRINT)

Name: Diosantia Perez

Address: 516-821-2065

I represent: Maddal Equities

Address: ~~207th Street~~ 207th street 9th Ave

THE COUNCIL
THE CITY OF NEW YORK

Inwood

Appearance Card

[]

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: PAUL GARRIARDI

Address: 3857 9th Ave

I represent: PEAK BEVERAGES Corp

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Inwood

Appearance Card

[]

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Tracy Hewlett

Address: _____

I represent: _____

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Inwood

Appearance Card

[]

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Ali Carrington

Address: _____

I represent: _____

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Inwood

Appearance Card

[Empty box]

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

Date: _____

(PLEASE PRINT)

Name: Ed Brown

Address: _____

I represent: Team Brown Consulting

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

re-zoning

Appearance Card

[Empty box]

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

Date: 7/10

(PLEASE PRINT)

Name: MARTY GOLDMAN

Address: 731 W 183rd

I represent: ZONING VOTE

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

[Empty box]

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition *Inwood NYC rezoning*

Date: July 10, 2018

(PLEASE PRINT)

Name: Anthony Zuba

Address: 608 Isham Street, New York, NY 10034

I represent: Church of the Good Shepherd

Address: 608 Isham Street, New York, NY 10034

THE COUNCIL
THE CITY OF NEW YORK

Inwood Rezoning

Appearance Card

[]

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

in favor in opposition

Date: 7/10/18

(PLEASE PRINT)

Name: Maggie Clarke

Address: 1795 Riverside Drive

I represent: Inwood Preservation

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Inwood Rezoning

Appearance Card

[]

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

in favor in opposition

Date: 7/10/18

(PLEASE PRINT)

Name: Peter Psathas

Address: 5099 Broadway

I represent: Myself

Address: 5099 Broadway

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

[]

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

in favor in opposition Inwood Rez

Date: July 10

(PLEASE PRINT)

Name: Graham Ciroulo

Address: 11 Seaman Ave

I represent: Good Shepherd JPIC

Address: 620 Isham St

THE COUNCIL
THE CITY OF NEW YORK

In wood Rezoning

Appearance Card

[]

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

in favor in opposition

Date: *7/10/18*

(PLEASE PRINT)

Name: *Jessica Matei*

Address: *235 Seaman Ave, #4E, NYC 10034*

I represent: *Northern Manhattan E Not For Sale*

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: *Denise Ricklas*

Address: *66 Overlook Terrace*

I represent: *NMN 45*

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: *Ruthie O'Connell*

Address: *16 Madison St 10053*

I represent: _____

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: _____

Name: Marshall Douglas
(PLEASE PRINT)

Address: 550 Ft. Washington Ave

I represent: the public of our Upper

Address: community

THE COUNCIL Inwood
THE CITY OF NEW YORK Rezoning

Appearance Card

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

in favor in opposition

Date: July 10, 2018

Name: Karla Fisk
(PLEASE PRINT)

Address: 101 Cooper St. #5N, NYC 10034

I represent: Inwood Small Business Coalition

Address: Inwood, Manhattan

THE COUNCIL Inwood
THE CITY OF NEW YORK Rezoning

Appearance Card

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

in favor in opposition

Date: July 10 2018

Name: Barbara "Emma" Goldman-Sherman
(PLEASE PRINT)

Address: 270 Scaman Ave Fl 6 NY NY 10034 (Inwood)

I represent: Myself and my neighbors including the

Address: children and elderly who will especially suffer
and save Inwood Albany

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. Inwood Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Cliff Elkind

Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Bernadette Elkind

Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Julia Rubin

Address: _____

I represent: Save Inwood Library

Address: 20 Seaman Ave

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

THE COUNCIL
THE CITY OF NEW YORK

*Inwood
Rezoning*

Appearance Card

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

in favor in opposition

Date: 7/10/2018

(PLEASE PRINT)

Name: Lena Melendez

Address: 565 W 162 St #63

I represent: Latinos in Defense of Businesses & Hsg

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: Cheremie Mon Desire

Address: 75 Park Terrace E.

I represent: Inwood

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

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

in favor in opposition

Date: 7/10/2018

(PLEASE PRINT)

Name: Valinn Ranelli (VALINN RANELLI)

Address: 11 Scamman Avenue #4B 10034

I represent: _____

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: 7.10.18

(PLEASE PRINT)

Name: JEANNE RUSKIN

Address: 11 SEAMAN AVE NYC

I represent: NORTHERN MANHATTAN IS

Address: NOT FOR SALE

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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

YA in favor in opposition

Date: _____

(PLEASE PRINT)

Name: YANILCIA ESPINAL

Address: 129 ROS SHERMAN

I represent: DOMINICANS

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: 7/10/18

(PLEASE PRINT)

Name: Steven Latham

Address: 259 Bennett Avenue 7D NY NY 10011

I represent: _____

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: 7/10/18

(PLEASE PRINT)

Name: Eric DelMayo

Address: 71 Park St, 7H NY 1024 1124

I represent: myself

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: 7/10/18

(PLEASE PRINT)

Name: YANILCIA ESPINAL

Address: 38 Post Ave

I represent: DOMINICANS

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: 07/10/18

(PLEASE PRINT)

Name: DUGA SACHREGLOVA

Address: 259 BENNETT AVE, NY 10040

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. _____ Res. No. _____

in favor in opposition

Date: July 10, 2018

(PLEASE PRINT)

Name: GERTRAUDE HAMILTON

Address: 45 PARK TERRACE WEST, Apt 4A D NY 10034

I represent: UNKNOWN RESIDENTS GOOD SUGGESTION PARKS ORG

Address: _____

Inwood

**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: Nova Lucero

Address: _____

I represent: Met Council on Housing

Address: _____

*Inwood
REZONING*

**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: 7/10/18

(PLEASE PRINT)

Name: KATHERINE O'SULLIVAN

Address: 1825 RIVERSIDE DRIVE #6A

I represent: _____

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: 7/10/18

(PLEASE PRINT)

Name: Carol STEVENS

Address: 91 Payson Ave. Apt 3G

I represent: Good Shepherds RUC Ministry and 91 Payson Board

Address: 207 St. Bwy.

**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: Ray Rogers

Address: PO Box 1002 Coiph Sta NYC 10276-1002

I represent: Corporate Campaign, Inc

Address: Same

**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: 7/10

(PLEASE PRINT)

Name: Cardis Hillier

Address: 25W. 15th St.

I represent: 32 B) SEIU

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

Inwood

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Abel Rodriguez

Address: 4963 Broadway 10034

I represent: Asociación de Restaurantes, NY

Address: Poder Hispano TV

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

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

in favor in opposition

Date: 7/10/18

(PLEASE PRINT)

Name: MAYA BHARDWAJ

Address: 746 St. Nicholas Ave NY NY 10031

I represent: FINY / Met Council / It Takes Roots

Address: 103-4 39th Ave NY NY 8

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

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

in favor in opposition

Date: 7/10/18

(PLEASE PRINT)

Name: PAUL EPSTEIN

Address: 60 Cooper St #4G, NY, NY 10034

I represent: Inwood Resident & Northern Manhattan

Address: Community based Trust

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: 7/10/18

(PLEASE PRINT)

Name: Rita Vega

Address: 207 Dyckmen St.

I represent: Manhattan Legal Services

Address: 5030 Broadway, Ste 4, NY NY 10034

**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: KATIE WEAVER

Address: 4761 B'WAY

I represent: UPTOWN UNITED / INWOOD

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: Lee Kallman

Address: _____

I represent: Iron Workers

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Inwood

Appearance Card

7/10/18

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: _____

Address: _____

I represent: _____

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Inwood

Appearance Card

7/10/18

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: _____

Address: _____

I represent: _____

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

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

in favor in opposition

Date: 7/10/18

(PLEASE PRINT)

Name: FERN HERTZBERG

Address: 1611 West 239th St, Bx, NY 10463

I represent: _____

Address: _____

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

THE COUNCIL
THE CITY OF NEW YORK

INWOOD
HEARINGS

Appearance Card

[]

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

Date: 7/10/18

(PLEASE PRINT)

Name: Charles CORLISS

Address: 245 E 93rd St NYC 10128

I represent: Inwood Community Services Inc.

Address: 651 ACADEMY STREET NYC 10034

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

[]

I intend to appear and speak on Int. No. ^{Inwood rezoning} _____ Res. No. _____
 in favor in opposition

Date: 07/10/18

(PLEASE PRINT)

Name: Christopher Kelly

Address: 55 Park Terrace East Apt. B83

I represent: myself, and fellow residents of Inwood

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

[]

I intend to appear and speak on Int. No. ^{INWOOD} _____ Res. No. _____
 in favor in opposition

Date: 7/10

(PLEASE PRINT)

Name: Avi Gardlick

Address: 220 WASSONTH AVE 407

I represent: N. Man. No. 4 Sale

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: 7/10/18

(PLEASE PRINT)

Name: Alexis Francisco

Address: 539 West 160st #2B, New York NY 10032

I represent: Wash Heights & Inwood

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Josmar Rojas

Address: 19 Vermilyea ave #3C New York, N.Y.

I represent: Inwood residents

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Inwood Rezoning

Appearance Card

[]

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

in favor in opposition

Date: 7/10/18

(PLEASE PRINT)

Name: Milagro Benitez

Address: 129 Sherman Ave

I represent: Dominican

Address: _____



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



Inwood rezoning

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: David Eisenbuch

Address: 201 E 12th Pl 12

I represent: _____

Address: _____

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

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

INWOOD REZONING in favor in opposition

Date: 07/10/2018

(PLEASE PRINT)

Name: MARSHALL VANDERPOOL

Address: 105 NAGLE AVENUE

I represent: DYCKMAN RESIDENT ASSOCIATION

Address: 1ST VICE PRESIDENT

*** 1/4
GROUP
COMMUNITY
BOARD 12, M

THE COUNCIL THE CITY OF NEW YORK

1 PM
HEARING

Appearance Card

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

SEE RESOLUTION (in favor in opposition)
* AFTER 2:45 PM (IN COURT)

Date: 7/10/2018

(PLEASE PRINT)

Name: SHAHABUDDIN AZLY, ESQ + CHAIR

Address: COMMUNITY BOARD 12, MANITOWAN - 530 W. 166 ST
NY 10032

I represent: CB 12, M

Address: 530 W. 166 ST - SUITE 601 NY 10032

XXX
GROUP 3/4
COMMUNITY
BOARD 12, M

THE COUNCIL THE CITY OF NEW YORK

1 PM
HEARING

Appearance Card

[]

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

SEE RESOLUTION (in favor in opposition)

Date: 7/10/2018

(PLEASE PRINT)

Name: ELIZABETH LORRIS-RITTER - CHAIR PARKS & CULTURAL AFFAIRS COMMITTEE

Address: COMMUNITY BOARD 12, MANHATTAN

I represent: CB 12, M

Address: 530 W. 166 ST - SUITE 601 NY, 10032

XXX
GROUP 3/4
COMMUNITY
BOARD 12, M

THE COUNCIL THE CITY OF NEW YORK

1 PM
HEARING

Appearance Card

[]

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

SEE RESOLUTION (in favor in opposition)

Date: 7/10/2018

(PLEASE PRINT)

Name: RICHARD LEWIS - 1ST VICE CHAIRMAN

Address: COMMUNITY BOARD 12, MANHATTAN 530 W. 166 ST NY, 10032

I represent: CB 12, M

Address: 530 W. 166 ST - SUITE 601 - NY 10032

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: 7/10/18

(PLEASE PRINT)

Name: Jai Ge Moduga

Address: _____

I represent: Modd Equities

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: 7/10/18

(PLEASE PRINT)

Name: Eli Weiss

Address: _____

I represent: Madd Cavities

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: 7/10/18

(PLEASE PRINT)

Name: Bill Bellinger

Address: _____

I represent: Madd Cavities

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: 7/10/18

(PLEASE PRINT)

Name: Charlie Bendit

Address: _____

I represent: Taconic

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: 7/10/18

(PLEASE PRINT)

Name: George Tsapelas

Address: _____

I represent: Taconic

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: 7/10/18

(PLEASE PRINT)

Name: Candis Tolliver

Address: _____

I represent: 32BJ

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: 7/10/18

(PLEASE PRINT)

Name: Paul Cagliardi

Address: _____

I represent: Flair Beverage

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: 7/10/18

(PLEASE PRINT)

Name: Anibal Rodriguez

Address: _____

I represent: Compare Foods

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: 7/10/18

(PLEASE PRINT)

Name: Zulay Mateo

Address: _____

I represent: Bodega Association

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: 7/10/18

(PLEASE PRINT)

Name: Peter Psathus

Address: _____

I represent: Twin Donut

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: 7/10/18

(PLEASE PRINT)

Name: Ivan Diaz

Address: _____

I represent: Properties in the TOM

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: 7/10/18

(PLEASE PRINT)

Name: Omar Soriano

Address: _____

I represent: Agenda Dominicana

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: 7/10/18

(PLEASE PRINT)

Name: Vincent Boudreau

Address: _____

I represent: CCNY President

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: 7/10/18

(PLEASE PRINT)

Name: Maria Lizardo

Address: _____

I represent: Northern Manhattan Improvement 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: 7/10/18

(PLEASE PRINT)

Name: Charles Corliss

Address: _____

I represent: Inwood Community Services

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: 7/10/18

(PLEASE PRINT)

Name: Isidro Medina

Address: _____

I represent: Washington Heights BID

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: 7/10/18

(PLEASE PRINT)

Name: Mino Lora

Address: _____

I represent: People's Theatre Project

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: 7/10/18

(PLEASE PRINT)

Name: Shah Ally or Ebenezer Smith

Address: _____

I represent: Manhattan CB 12

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: 7/10/18

(PLEASE PRINT)

Name: Marshall Vanderpool

Address: _____

I represent: NYCHA

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: 7/10/18

(PLEASE PRINT)

Name: Charlie Reynoso

Address: _____

I represent: New York Restoration Project

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: 7/10/18

(PLEASE PRINT)

Name: James Cataldi

Address: _____

I represent: Inwood Resident

Address: _____

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