



BROOKLYN COMMUNITY BOARD 14
FLATBUSH–MIDWOOD COMMUNITY DISTRICT
810 East 16th Street
Brooklyn, New York 11230

ERIC L. ADAMS
Mayor

January 26, 2024

ANTONIO REYNOSO
Borough President

New York City Planning Commission
120 Broadway
31st Floor
New York, NY 10271

JO ANN BROWN
Chair

SHAWN CAMPBELL
District Manager

Dear Chair Garodnick and City Planning Commissioners,

EXECUTIVE COMMITTEE

KARL-HENRY CESAR
First Vice-Chair

STEVEN D. COHEN
Second Vice-Chair

JOSEPH DWECK
Third Vice-Chair

HINDY BENDEL
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SHAHID KHAN
Member-at-Large

FLORENCIA CHANG-AGEDA
Member-at-Large

ALVIN M. BERK
Chairman Emeritus

Brooklyn Community Board 14 is submitting the City of Yes for Economic Development proposal worksheet for your consideration. Please note that board members dedicated a total of five public meetings to consider COY EO including a Housing and Land Use Committee meeting on November 1, 2023; a Transportation Committee meeting on 12/21/23 to consider relevant proposals; a Community Environment, Cultural Affairs and Economic Development Committee meeting on 1/18/24 to consider relevant proposals; as well as a public hearing held on 1/3/24; followed by a regular monthly meeting of the board on 1/8/24 and concluding with a meeting of a Committee of the Whole on 1/24/24. Chair Jo Ann Brown attended the Brooklyn Borough President's public hearing, and board members and the District Manager participated in information sessions and CPC's public hearing on 1/24/24.

The COY EO zoning text amendment proposal is complex. Positive outcomes depend heavily on undeveloped enforcement potential to ensure that good actors reap the intended benefits. Representatives from the Department of City Planning noted that relevant city agencies were consulted in the development of this proposal but failed to provide documentation of agency input. Agencies that provided public testimony, such as Small Business Services and the Office of Urban Agriculture were supportive, which makes sense given their respective missions. However, it would have been of great value to have information from the Department of Buildings as to how they would ensure new zoning compliance, especially given DOB's abysmal track record in CD14 enforcing zoning violations. It would have been of value to have documentation as to how the Department of Consumer and Worker Protection would continue to carry out its mission in this new landscape. Concerns were expressed by a retired Lieutenant from FDNY at the Brooklyn Borough President's public hearings in relation to commercial activity above ground floor and the expansion of home use. What was FDNY's official comment on the COY EO? Did DEP, NYPD, HPD, DOF or any other potentially involved city agency formally weigh in on the proposal? Were any concerns raised? Were none?

DCP has identified worthy goals to foster growth through an equity lens and Brooklyn Community Board 14 is supportive of desired outcomes. This would be a great proposal if all New Yorkers were good actors. However, the density and complexity of the proposal makes it difficult to determine the extent to which unintended consequences might overtake the

goals of the proposals. Concerns about safety and quality of life including noise, odors, delivery schedules, etc. as commercial activity is introduced in residential zones were raised in relation to most of the proposals. Positive versus negative impacts on traffic were debated in regard to distribution zones and automotive repair activity. Compartment with state laws and licensing and Federal tax deduction rules for use of home office were questioned. Competing uses for residential units given the affordable housing crises in NYC is a concern. Taking public input out of so many changes in use could go awry.

Yet, the members of CB14 have conditionally supported nearly every proposal as reflected in the worksheet and addenda. Two proposals were not supported with conditions and the board offered no recommendation on two proposals that have little to no relevance in our district. We yield to the community members more directly impacted by those proposals and hope that the CPC will do the same. Please listen closely to those community members working and living in the variety of neighborhoods in NYC that will be changed. Value the wisdom that comes from experience and expertise. Don't allow good ideas to fall victim to bad plans. This board has granted DCP a lot of faith. Make good on it.

Respectfully,



Jo Ann Brown
Chair

cc: Hon. Antonio Reynoso, Brooklyn Borough President