



**THE CITY OF NEW YORK
COMMUNITY BOARD NO. 16**
444 Thomas S. Boyland Street -Room 103
Brooklyn, New York 11212



ANTONIO REYNOSO
Borough President

E-mail: bk16@cb.nyc.gov
Website: www.nyc.gov/brooklyn16
Tel : (718) 385-0323

GENESE MORGAN
Chairperson

July 30, 2024

NYC Department of City Planning
120 Broadway, 31st Floor
New York, New York 10271

Re: City of Yes for Housing Opportunity

At its monthly Executive committee meetings on May 20, 2024, and June 24, 2024, and its public meetings held on May 21, 2024, Community Board #16 met with NYC Department of City Planning, to discuss the proposed zoning text amendments of the City of Yes for Housing Opportunity concerning housing growth in every neighborhood and received with respect to Community District 16 and its unique neighborhood challenges. At its June 25, 2024, meeting members of the board voted 1 in favor, 26 in opposition and 3 abstentions to the request for support of the proposal elements.

Attached is detailed feedback concerning the board's decision titled "Community Board 16 Response and Counter Proposal."

Very truly yours,

GENESE MORGAN
Chairperson

City of Yes for Housing Opportunity

Community Board 16 Response and Counter-Proposal

2024

Community Context

Brownsville and Ocean Hill are communities with a rich history of activism and resilience. In response to Jewish flight, the predominantly Jewish neighborhoods of Brownsville and Ocean-Hill received an influx of Black and Latino residents seeking affordable housing.¹ The shift of the face of the “ghetto” led to systematic government divestment which coupled with the loss of a middle class, and a loss of jobs previously provided by local factories, created one of the highest concentrations of poverty in the nation.² The increased poverty and increased population then resulted in increased unemployment, underserved schools, crime, and violence that persist today. Historic events/conflicts, namely the Ocean Hill Brownsville Teacher’s Strike, police disparate treatment of Blacks vs Jews, the aftermath of the 1977 Blackout led to withdrawal by the government and larger society.³ Many other Brooklyn neighborhoods⁴ have experienced gentrification and by extension an increase in resources, for better or for worse. The same cannot be said for Brownsville. In effect, Brownsville became an island isolated from resources and insulated with stigma and Ocean Hill a reluctant sibling looking to run away from the family name.⁵

This historical background is significant and relevant because it provides context for the current housing landscape, dearth of resources, high rates of poverty and violence, and overall communal sentiment of societal abandonment. This context also provides the basis for the City of New York to continue its journey of rectifying decades of neglect. The suggestions offered by this counter proposal will not heal all the community’s wounds but since the problems began with housing perhaps the solution can also begin with housing.

It is well established that with eighteen (18) NYCHA public housing developments within only 1.2 square miles, Brownsville has the largest concentration of public housing in the nation.⁶ Public welfare programs are necessary to address various economic and social concerns faced by families, but it shouldn’t punish families for working and it should support those families who seek to transition out of public housing. A path forward looks like revamping

¹ Brownsville, Brooklyn: Blacks, Jews, and the Changing Face of the Ghetto
https://books.google.com/books?id=ya7R_KRaNP4C

² Id.

³ <https://www.nytimes.com/2018/11/17/opinion/teachers-strike-liberals-ocean-hill-brownsville.html>
<https://tempestmag.org/2023/09/ocean-hill-brownsville-and-the-freedom-schools-of-1968/>
<https://www.vitalcitynyc.org/articles/brownsville-and-bay-ridge>

⁴ Crown Heights has a significant history of tension between Jewish and Black residents which delayed gentrification but ultimately was outweighed by the proximity to downtown Brooklyn and high concentration of “desirable housing.”
<https://www.cbsnews.com/newyork/news/crown-heights-riots-30-years-later/>
<https://citylimits.org/2016/08/18/riot-anniversary-finds-jews-and-blacks-of-crown-heights-facing-common-threat-displacement/>

⁵ <https://www.brownstoner.com/forum-archive/2007/10/bedfordstuyvesa-2/>

⁶ <https://map.cityofnewyork.us/wp-content/uploads/2019/01/Brownsville-Houses-Policy-Brief.pdf>

NYCHA to provide structural programs and incentives that support families transitioning out of public housing.

The dense developments in Brownsville are faced with turf wars and limited means of financial mobility and security thus, home ownership is often a pipe dream. Inherent, to building homes is creating economic opportunities that make home ownership viable.

We know our city has a declining infrastructure, increased technology needs, and an aging civil servant population. Building a technology hub within Community Board 16, using federal funds, will allow revitalization to take place and an opportunity to energize a rising generation that is intertwined with technology.⁷ Expanding targeted programming to prepare residents, particularly Brownsville NYCHA residents, for immediate employment with practical and technical skills (i.e. Job Corp, professional licensures) for trades and various City government jobs also provides a means to ownership. Partnering with communal and faith-based entities that desire to own land but need capital and government subsidies to facilitate development are another avenue to ownership as exemplified by the Nehemiah homes.⁸

As these incentives begin to shift the landscape, the City of New York should also consider a local variation of HOPE VI (which was brought to Ocean Hill's Prospect Plaza Houses and will eventually provide Ocean Hill with mixed income housing) with an emphasis on homeownership instead of displacement.⁹ Public housing was never meant to be and should not be used as a permanent life sentence but instead a platform to launch into larger society. Perhaps an end to the turf will allow for the community to heal and expand.

To shift both the narrative and reality for residents of Community Board 16 there has to be an example and a path to generational wealth. Housing and land ownership have always been a beacon and means to build wealth within this country. Community Board 16 deserves the same opportunities experienced by other Brooklynites, other New Yorkers, and other Americans. Neighboring communities such as Bedford Stuyvesant, while historically plagued with similar issues, do not have a narrative of despair whether erroneously placed by outsiders or adopted by community members themselves. Critics often point to historic landmarks and brownstones that are identified as "desirable housing" as well as various economic opportunities.

Community Board 16 deserves and arguably requires "desirable housing" to provide an example within the community of wealth and generational wealth. An example looks like pushing developers to ***Bring Brownstones to Brownsville***. In essence, when developers look to propose new housing in Brownsville and Ocean Hill it shouldn't only consist of dense sky rise buildings that are uncharacteristic of Brooklyn. Rather, projects should include homes like Brownstones that not only accommodate multiple families or encourage families to age in place but increase both the value, aesthetic, and pride in the community.

On behalf of the board members of Community Board 16 and the people who call Ocean Hill and Brownsville their home, we hope that this counter proposal initiates necessary dialogue,

⁷ <https://www.eda.gov/funding/programs/regional-technology-and-innovation-hubs>

⁸ <https://brooklynnehemiah.org>

⁹ <https://citylimits.org/2023/10/12/as-chelsea-demo-plans-move-ahead-a-look-back-to-nychas-brooklyn-razing/>

facilitates crucial change, and brings overdue funding to a community that has been left behind for far too long.

Low-Density

Town Center Zoning

In response to the proposal to Re-introduce buildings with ground floor commercial and two to four stories of housing above, in areas where this classic building form is banned under today's restrictive zoning, Community Board 16 submits the following:

Community Board 16 (hereinafter CB 16) is already substantially burdened by dense residential buildings, NYCHA Housing, supportive housing, and shelters. The proposed commercial-residential blend buildings already exist in mass on most main thoroughfares throughout Brownsville including East 98th Street, Pitkin Ave, East New York Ave and Ocean Hill including Atlantic Ave and Ralph Avenue to name a few. CB 16 rejects this proposal as it will disproportionately increase the burden of housing onto the CB 16 community.

However, to the extent that this proposal passes and is applicable to neighborhoods within the Brownsville and Ocean-Hill area, CB 16 requests clarification as to the type of businesses that will be allowed below the proposed residential housing. Further, as it relates to purportedly increasing such housing across the entire city, CB 16 requests data transparency as to how many of the proposed buildings are built throughout the respective community boards in comparison to what historically existed. Transparency looks like an annual report and public hearing (may be biennial) to disseminate data and shed light on which neighborhoods continue to shoulder the burden of the city's housing.

Finally, should this proposal pass, the New York City Department of Planning/NYC Planning Commission needs to bring all stakeholders to the table for an interagency proposal including, but not limited to, the NYC Department of Finance, the NYC Department of Buildings, the NYC Department of Environmental Protection, regulated utility companies such as Consolidated Edison Company of New York, Inc. and National Grid; and any other stakeholder entities that can facilitate grant funding, low interest loans, and tax break incentives for CB16 community members who wish to own or build the proposed housing, city-wide agreements that will fix or structure the utility rates inasmuch as increased buildings increase the overall cost of energy, and street parking solutions such as reducing alternate side parking and ground floor/underground parking.

Transit-Oriented Development

In response to the proposal to Allow modest, three-to-five story apartment buildings where they fit best: large lots within half a mile of subway or Rail stations that are on wide streets or corners, Community Board 16 submits the following:

Community Board 16 (hereinafter CB 16) is already substantially burdened by dense residential buildings, NYCHA Housing, supportive housing, and shelters. The proposed "modest" sized apartment buildings already exist in mass throughout Brownsville and Ocean Hill near every major subway and rail station for the A and C lines, J and Z lines, the LIRR, and the 3 and 4

subway lines. CB 16 rejects this proposal as it will disproportionately increase the burden of housing onto the CB 16 community

However, to the extent that this proposal passes and is applicable to neighborhoods within the Brownsville and Ocean-Hill area, CB16, requests data transparency as to how much of the proposed buildings are built throughout the respective community boards in comparison to what historically existed. Transparency looks like an annual report and public hearing (may be biennial) to disseminate data and shed light on which neighborhoods continue to shoulder the burden of the city's housing.

Further, the New York City Department of Planning/NYC Planning Commission needs to bring all stakeholders to the table for an interagency proposal including, but not limited to, the NYC Transit Authority, NYC Metropolitan Transit Authority, the NYC Department of Finance, the NYC Department of Buildings, the NYC Department of Environmental Protection, regulated utility companies such as Consolidated Edison Company of New York, Inc. and National Grid; and any other stakeholder entities that can facilitate grant funding, low interest loans, and tax break incentives for CB16 community members who wish to own or build the proposed housing, city-wide agreements that will fix or structure the utility rates inasmuch as increased buildings increase the overall cost of energy, street parking solutions such as reducing alternate side parking, ground floor/underground parking, and free/reduced transportation.

Finally, since the City seeks to increase housing that is transit accessible, stakeholders such as the NYC Transit Authority and the NYC Metropolitan Transit Authority need to revisit how the Brownsville and Ocean-Hill communities are serviced. Currently, many of the subway stations throughout CB16 are underserved with long wait times even during rush hours, Buses are often delayed and rerouted including *Schleppie* award winner for most unreliable service: the B12, and stations are often unsanitary breeding grounds for rats and viral infections.

Accessory Dwelling Units

In response to the proposal to Permit accessory dwelling units such as backyard cottages, garage conversions, and basement apartments, Community Board 16 submits the following:

Community Board 16 (hereinafter CB 16) is already substantially burdened by dense residential buildings, NYCHA Housing, supportive housing, and shelters. CB 16 rejects this proposal as it will disproportionately increase the burden of housing onto the CB 16 community

However, to the extent that this proposal passes and is applicable to neighborhoods within the Brownsville and Ocean-Hill area, CB 16 requests that the New York City Department of Planning/NYC Planning Commission bring all stakeholders to the table for an interagency proposal including, but not limited to, the NYC Department of Finance, the NYC Department of Buildings, the NYC Department of Environmental Protection, regulated utility companies such as Consolidated Edison Company of New York, Inc. and National Grid; and any other stakeholder entities that can facilitate grant funding, low interest loans, and tax break incentives for CB16 community members who wish to own or build the proposed housing, city-wide agreements that will fix or structure the utility rates inasmuch as increased buildings increase the

overall cost of energy, and street parking solutions such as reducing alternate side parking and ground floor/underground parking.

Further, CB16 requests a streamlined process with NYC Department of Buildings that will remove many of the barriers to obtaining appropriate permits including property violations that predate the current ownership, paths to legalization (without fines or penalties) of basement apartments, existing works and structures.

District Fixes

In response to the proposal to Give homeowners additional flexibility to adapt their homes to meet their families' needs, Community Board 16 submits the following:

Community Board 16 (hereinafter CB 16) is already substantially burdened by dense residential buildings, NYCHA Housing, supportive housing, and shelters. CB 16 rejects this proposal as it will disproportionately increase the burden of housing onto the CB 16 community

However, to the extent that this proposal passes and is applicable to neighborhoods within the Brownsville and Ocean-Hill area, CB 16 requests that the New York City Department of Planning/NYC Planning Commission bring all stakeholders to the table for an interagency proposal including, but not limited to, the NYC Department of Finance, the NYC Department of Buildings, the NYC Department of Environmental Protection, regulated utility companies such as Consolidated Edison Company of New York, Inc. and National Grid; and any other stakeholder entities that can facilitate grant funding, low interest loans, and tax break incentives for CB16 community members who wish to make alterations to their exist housing, city-wide agreements that will fix or structure the utility rates inasmuch as increased buildings increase the overall cost of energy, and street parking solutions such as reducing alternate side parking and ground floor/underground parking.

Further, CB16 requests a streamlined process with NYC Department of Buildings that will remove many of the barriers to obtaining appropriate permits including property violations that predate the current ownership, paths to legalize existing works and structures, without penalties, provided there are no immediate safety threats.

Medium and High Density

Universal Affordability Preference

In response to the proposal to allow buildings to add at least 20% more housing if the additional homes are permanently affordable. This proposal extends an existing rule for affordable senior housing to all forms of affordable and supportive housing, Community Board 16 submits the following:

Community Board 16 (hereinafter CB 16) is already substantially burdened by dense residential buildings, NYCHA Housing, supportive housing, and shelters. This proposal alters the skyline and reduces our air rights. CB 16 rejects this proposal as it will disproportionately increase the burden of housing onto the CB 16 community.

However, to the extent that this proposal passes and is applicable to neighborhoods within the Brownsville and Ocean-Hill area, CB 16 requests that the New York City Department of Planning/NYC Planning Commission bring all stakeholders to the table for an interagency proposal that addresses the NYC Housing Connect process as any additional housing will be posted to the housing lottery process.

Currently, tens of thousands of New Yorkers apply for affordable housing and the lengthy wait and review process restrict access to affordable housing from those families that really need it. Further, the City's definition of affordable does not accurately reflect the income of most of the residents in Brownsville and Ocean Hill thus, many of the new "affordable" apartments are not financially accessible. As a solution, in lieu of increasing the community preference which has historically in forced segregation, CB 16 should be offered the right of first refusal for any new developments. In practice, applications for new developments should be made limited to CB 16 community members only for 45 to 60 days before release as a part of the lottery process. Additionally, creating a shifting standard wherein applicants will be evaluated by either the Federal AMI standard or a proposed City alternative standard, that addresses the neighborhood specific income disparities, will allow for an applicant to be evaluated by the standard that affords the least amount of rent possible. This practice can also be modeled in other community districts facing the concerns of gentrification and consequently displacement.

Citywide

Lift Costly Parking Mandates

In response to the proposal to eliminate mandatory parking requirements for new buildings; Parking would still be allowed, and projects can add what is appropriate at their location, Community Board 16 submits the following:

CB 16 rejects this proposal as it will disproportionately increase the burden of parking on the CB 16 community. Instead, where developers seek to limit existing parking and create future burden on parking, projects must detail creative solutions to parking which is an expressed need of the CB 16 community. For instance, many developed projects in other parts of Brooklyn such as Flatbush incorporate ground floor parking. Projects should consider ground level and underground (basement, sub-basement) parking.

Convert Non-Residential Buildings to Housing

In response to the proposal to make it easier for underused, nonresidential buildings, such as offices, to be converted into housing, Community Board 16 submits the following:

Community Board 16 (hereinafter CB 16) is already substantially burdened by dense residential buildings, NYCHA Housing, supportive housing, and shelters. CB 16 rejects this proposal as it will disproportionately increase the burden of housing onto the CB 16 community

However, to the extent that this proposal passes and is applicable to neighborhoods within the Brownsville and Ocean-Hill area, CB 16 requests that the New York City Department of Planning/NYC Planning Commission bring all stakeholders to the table for an interagency proposal that addresses the NYC Housing Connect process as any additional housing will be

posted to the housing lottery process. Currently, tens of thousands of New Yorkers apply for affordable housing and the lengthy wait and review process restrict access to affordable housing from those families that really need it. Further, the City's definition of affordable does not accurately reflect the income of most of the residents in Brownsville and Ocean Hill thus, many of the new "affordable" apartments are not financially accessible. As a solution, in lieu of increasing the community preference which has historically in forced segregation, CB 16 should be offered the right of first refusal for any new developments. In practice, applications for new developments should be made limited to CB 16 community members only for 45 to 60 days before release as a part of the lottery process. Additionally, creating a shifting standard wherein applicants will be evaluated by either the Federal AMI standard or a proposed City alternative standard, that addresses the neighborhood specific income disparities, will allow for an applicant to be evaluated by the standard that affords the least amount of rent possible. This practice can also be modeled in other community districts facing the concerns of gentrification and consequently displacement.

Small and Shared Housing

In response to the proposal to re-introduce housing with shared kitchens or other common facilities. Eliminate strict limits on studios and one-bedroom apartments, Community Board 16 submits the following:

Community Board 16 (hereinafter CB 16) is already substantially burdened by dense residential buildings, NYCHA Housing, supportive housing, and shelters.

However, to the extent that this proposal passes and is applicable to neighborhoods within the Brownsville and Ocean-Hill area, CB 16 requests that the New York City Department of Planning/NYC Planning Commission bring all stakeholders to the table for an interagency proposal including, but not limited to, the NYC Department of Finance, the NYC Department of Buildings, the NYC Department of Environmental Protection, regulated utility companies such as Consolidated Edison Company of New York, Inc. and National Grid; and any other stakeholder entities that can facilitate grant funding, low interest loans, and tax break incentives for CB16 community members who wish to make alterations to their exist housing, city-wide agreements that will fix or structure the utility rates inasmuch as increased buildings increase the overall cost of energy, and street parking solutions such as reducing alternate side parking and ground floor/underground parking.

Campus Infill

In response to the proposal to make it easier to add new housing on large sites that have existing buildings on them and already have ample space to add more, (e.g., a church with an oversized parking lot), Community Board 16 submits the following:

Community Board 16 (hereinafter CB 16) is already substantially burdened by dense residential buildings, NYCHA Housing, supportive housing, and shelters.

However, to the extent that this proposal passes and is applicable to neighborhoods within the Brownsville and Ocean-Hill area, CB 16 requests that the New York City Department of

Planning/NYC Planning Commission bring all stakeholders to the table for an interagency proposal including, but not limited to, the NYC Department of Finance, the NYC Department of Buildings, the NYC Department of Environmental Protection, regulated utility companies such as Consolidated Edison Company of New York, Inc. and National Grid; and any other stakeholder entities that can facilitate grant funding, low interest loans, and tax break incentives for CB16 community members who wish to make alterations to their exist housing, city-wide agreements that will fix or structure the utility rates inasmuch as increased buildings increase the overall cost of energy, and street parking solutions such as reducing alternate side parking and ground level/underground parking.

Further, CB 16 requests that any funding or incentives be extended to collectives, community land trusts, community-based entities such as churches and other groups. CB 16 is home to the historic Nehemiah homes developed by local citizens and churches seeking to better the CB 16 community. Grant funding that targets and incentives community-based churches and groups to develop their land is a mutually beneficial condition.

Miscellaneous

New Zoning Districts

In response to the proposal to create new Residence Districts requiring Mandatory Inclusionary Housing that can be mapped in central areas in compliance with state requirements (citywide), Community Board 16 submits the following:

Community Board 16 (hereinafter CB 16) is already substantially burdened by dense residential buildings, NYCHA Housing, supportive housing, and shelters.

However, to the extent that this proposal passes and is applicable to neighborhoods within the Brownsville and Ocean-Hill area, CB 16 requests that the New York City Department of Planning/NYC Planning Commission bring all stakeholders to the table for an interagency proposal that addresses the NYC Housing Connect process as any additional housing will be posted to the housing lottery process. Currently, tens of thousands of New Yorkers apply for affordable housing and the lengthy wait and review process restrict access to affordable housing from those families that really need it. Further, the City's definition of affordable does not accurately reflect the income of the majority of the residents in Brownsville and Ocean Hill thus, many of the new "affordable" or so called "inclusionary" apartments are not financially accessible. As a solution, in lieu of increasing the community preference which has historically in forced segregation, CB 16 should be offered the right of first refusal for any new developments. In practice, applications for new developments should be made limited to CB 16 community members only for 45 to 60 days before release as a part of the lottery process. Additionally, creating a shifting standard wherein applicants will be evaluated by either the Federal AMI standard or a proposed City alternative standard, that addresses the neighborhood specific income disparities, will allow for an applicant to be evaluated by the standard that affords the least amount of rent possible. This practice can also be modeled in other community districts facing the concerns of gentrification and consequently displacement.

Update to Mandatory Inclusionary Housing

In response to the proposal to allow the deep affordability option in Mandatory Inclusionary Housing to be used on its own (citywide), Community Board 16 submits the following:

Community Board 16 (hereinafter CB 16) is already substantially burdened by dense residential buildings, NYCHA Housing, supportive housing, and shelters.

However, to the extent that this proposal passes and is applicable to neighborhoods within the Brownsville and Ocean-Hill area, CB 16 requests that the New York City Department of Planning/NYC Planning Commission bring all stakeholders to the table for an interagency proposal that addresses the NYC Housing Connect process as any additional housing will be posted to the housing lottery process. Currently, tens of thousands of New Yorkers apply for affordable housing and the lengthy wait and review process restrict access to affordable housing from those families that really need it. Further, the City's definition of affordable does not accurately reflect the income of the majority of the residents in Brownsville and Ocean Hill thus, many of the new "affordable" or so called "inclusionary" apartments are not financially accessible. As a solution, in lieu of increasing the community preference which has historically in forced segregation, CB 16 should be offered the right of first refusal for any new developments. In practice, applications for new developments should be made limited to CB 16 community members only for 45 to 60 days before release as a part of the lottery process. Additionally, creating a shifting standard wherein applicants will be evaluated by either the Federal AMI standard or a proposed City alternative standard, that addresses the neighborhood specific income disparities, will allow for an applicant to be evaluated by the standard that affords the least amount of rent possible. This practice can also be modeled in other community districts facing the concerns of gentrification and consequently displacement.

Silver Law

In response to the proposal to allow narrow lots to achieve underlying Quality Housing heights in R7-R10 districts, Community Board 16 submits the following:

Community Board 16 (hereinafter CB 16) is already substantially burdened by dense residential buildings, NYCHA Housing, supportive housing, and shelters.

However, to the extent that this proposal passes and is applicable to neighborhoods within the Brownsville and Ocean-Hill area, CB 16 requests that the New York City Department of Planning/NYC Planning Commission bring all stakeholders to the table for an interagency proposal including, but not limited to, the NYC Department of Finance, the NYC Department of Buildings, the NYC Department of Environmental Protection, regulated utility companies such as Consolidated Edison Company of New York, Inc. and National Grid; and any other stakeholder entities that can facilitate grant funding, low interest loans, and tax break incentives for CB16 community members who wish to create new housing, city-wide agreements that will fix or structure the utility rates inasmuch as increased buildings increase the overall cost of energy, and street parking solutions such as reducing alternate side parking and ground/underground parking.

Quality Housing Amenity Changes

In response to the proposal to extend amenity benefits in the “Quality Housing” program to all multifamily buildings, and update to improve incentives for family-sized apartments, trash storage and disposal, indoor recreational space, and shared facilities like laundry, mail rooms, and office space (citywide), Community Board 16 submits the following:

Community Board 16 (hereinafter CB 16) is already substantially burdened by dense residential buildings, NYCHA Housing, supportive housing, and shelters.

However, to the extent that this proposal passes and is applicable to neighborhoods within the Brownsville and Ocean-Hill area, CB 16 requests that the New York City Department of Planning/NYC Planning Commission bring all stakeholders to the table for an interagency proposal including, but not limited to, the NYC Department of Finance, the NYC Department of Buildings, the NYC Department of Environmental Protection, regulated utility companies such as Consolidated Edison Company of New York, Inc. and National Grid; and any other stakeholder entities that can facilitate grant funding, low interest loans, and tax break incentives for CB16 community members who wish to make alterations to their exist housing, city-wide agreements that will fix or structure the utility rates inasmuch as increased buildings increase the overall cost of energy, and street parking solutions such as reducing alternate side parking and ground/underground parking.

Landmark Transferable Development Rights

In response to the proposal to make it easier for landmarks to sell unused development rights by expanding transfer radius and simplifying procedure (citywide), Community Board 16 submits the following:

Community Board 16 (hereinafter CB 16) is already substantially burdened by dense residential buildings, NYCHA Housing, supportive housing, and shelters. Further, like many historically black and underserved communities throughout New York City, CB16 faces the threat of displacement of long- time residents due to gentrification and out-pricing.

However, to the extent that this proposal passes and is applicable to neighborhoods within the Brownsville and Ocean-Hill area, CB 16 requests that that the New York City Department of Planning/NYC Planning Commission bring all stakeholders to the table to ensure that community members from Brownsville and Ocean Hill have the right of first refusal for the sale of any unused development rights. Specifically, any sale will be first posted publicly with adequate notice given to the community board office and local government official offices.

Railroad Right-of-Way

In response to the proposal to simplify and streamline permissions for development involving former railroad rights of way (citywide), Community Board 16 submits the following:

Community Board 16 (hereinafter CB 16) is already substantially burdened by dense residential buildings, NYCHA Housing, supportive housing, and shelters.

However, to the extent that this proposal passes and is applicable to neighborhoods within the Brownsville and Ocean-Hill area, CB 16 requests that the New York City Department of Planning/NYC Planning Commission bring all stakeholders to the table for an interagency

proposal including, but not limited to, the NYC Department of Finance, the NYC Department of Buildings, the NYC Department of Environmental Protection, regulated utility companies such as Consolidated Edison Company of New York, Inc. and National Grid; and any other stakeholder entities that can facilitate grant funding, low interest loans, and tax break incentives for CB16 community members who wish create housing, city-wide agreements that will fix or structure the utility rates inasmuch as increased buildings increase the overall cost of energy, and street parking solutions such as reducing alternate side parking and ground/underground parking.

Further, CB 16 requests that any funding or incentives be extended to collectives, community land trusts, community-based entities such as churches and other groups. CB 16 is home to the historic Nehemiah homes developed by local citizens and churches seeking to better the CB 16 community. Grant funding that targets and incentives community-based churches and groups to develop their land is a mutually beneficial condition.