

April 18, 2016

Carol J. Samol  
Bronx Borough Director  
NYC Department of City Planning  
1 Fordham Plaza, 5<sup>th</sup> Floor, Bronx NY 10458

**RE: Jerome Ave Rezoning**

Dear Carol Samol,

The Bronx Coalition for a Community Vision has been working in the Southwest Bronx for over a year to gather feedback from residents about how the Jerome Avenue rezoning plan can benefit the local community and help our neighborhoods thrive. We have engaged thousands of residents over the course of dozens of meetings and hundreds of surveys, and collectively, the group has identified several key principles that should guide the rezoning:

1. **Anti-displacement strategies for current residential and commercial tenants.** Current tenants and small business owners will not benefit from the rezoning if the rezoning increases rents, speculation, and the forces of displacement. The City should take steps to ensure that the people and businesses that are here now are protected and are able to stay.
2. **Real affordable housing.** All of the new housing built in the community should be at rent levels that reflect the need in the community.
3. **Good jobs & local hire.** New construction and businesses will mean a lot of new jobs in the area and the City should guarantee that those jobs create career opportunities for local residents. Also, developers should not be allowed to build unless they commit to using contractors that are part of State Department of Labor Registered and Approved Apprenticeship programs.
  - a. **Safety and training.** There recently has been an alarming increase in construction worker fatalities and life changing injuries in New York City. 18 construction workers died in the field from the beginning of 2015 to date. The City must mandate provisions for worker safety and training to ensure our most vulnerable workers are protected.
4. **Real community engagement.** Residents need to have a say over what happens in the community, and the City should have long-term tools to ensure accountability for implementing commitments made during rezoning approval process, including a role for community in overseeing progress. The community needs this to ensure that the rezoning is actually part of a community plan that is effective and fully implemented.

On March 9, 2016, we sent you a detailed letter outlining the recommendations from our report that can be incorporated into the zoning text and accompanying neighborhood plan for Jerome Ave. In the attached letter, we describe the analyses we believe the Department of City Planning

(DCP) must perform to adequately assess the neighborhood need, the impacts of the proposed plan, and the feasibility of the coalition's policy proposals.

As the City prepares to release its proposal, we urge the City to perform these analyses to accurately measure impacts in the environmental review, recommend these mitigations as part of the ULURP process, and adopt these recommendations as part of crafting a plan that meaningfully advances the community's goals. Above all, we urge the City to examine not just the extent to which the proposed Jerome Ave rezoning may advance the City's overall policy goals, including the Housing New York plan, but also how much the rezoning advances the local goals community members have identified. The rezoning of Jerome Ave should not just be thought of as a means to the end of advancing the Mayor's affordable housing plan - the stakes for longtime community residents are high and they should not be an afterthought. Instead, the plan should also be crafted and assessed based on the how much the rezoning will benefit current residents.

We are asking that what appears in the draft scope and is proposed to be studied in the EIS include our recommendations for what should be written into the zoning text. This will be a sign that the administration is willing to look at the needs that community residents have identified.

In addition, between the time the draft scope is released and before ULURP starts, we want the following recommendations to be implemented (the policies are explained in more detail in the attached letter):

**Anti-Displacement and Anti-Harassment Policies for Residential Tenants:**

- Pass and Fund Intro 214, providing a right to counsel for all tenants facing the loss of their home in NYC
- Pass legislation enacting a citywide certificate of no harassment that will be in place before the Jerome Ave ULURP applies.

**Anti-Displacement for the Commercial Tenants and Auto Workers on Jerome Ave:**

- The City should ensure that the auto workers do not lose their livelihoods. This can be done by enhancing the retention areas, identifying relocation locations, as well as ensuring that all businesses are in compliance.

**Good Jobs, Local Hire, Safety and Training:**

Public funds come with public responsibility. Tax payer funded subsidies used by developers and contractors to build affordable housing should provide good wages to help the community create more middle class jobs; require utilization of the State Department of Labor Registered and Approved Apprenticeship Program and demand the highest level of safety training available to ensure safe working site and communities.

- The City should provide funding for programs to ensure that local residents are eligible and prepared for the state certified apprenticeship programs, including GED programs, stipends and childcare.
- The City must also adopt local hiring requirements for the rezoned area. This can be done either through the creation of special purpose districts that mandate local hire and/or through an executive action that mandates local hiring for all projects using city subsidies.
- The City must mandate provisions for worker safety and training to ensure our most vulnerable workers are protected. Developers should not be allowed to build unless they commit to using contractors that are part of a NYS approved apprenticeship program.

### **Real Affordable Housing:**

- The City should ensure that new housing reflects the needs of current neighborhood residents, including rent levels affordable to the current community. This should be done through the creation of a special purpose district that mandates real affordable housing and local hire, and/or through the creation of a new HPD term sheet that will match the AMI levels prevalent in the community.
- The City should create new requirements for developers seeking public subsidies (see attached for more info).

### **Real Community Engagement:**

- Create a formal opportunity for community oversight of the plan's implementation.

We believe that we are at a moment where we face a challenge to do zoning in a different way. We believe that our plan lays out a roadmap to achieve progress and change without exploitation, harassment and displacement.

While we have yet to see the specific plan for Jerome Avenue, the draft framework that DCP has presented foresees a Jerome Ave of increased density and an 83% loss of districts zoned for manufacturing and heavy commercial uses.

If our recommendations are not incorporated into the plan before ULURP starts, we believe that the displacement pressures will be so great that the negative consequences of the rezoning will greatly outweigh any benefits or progress it might bring. We will have no choice but to urge our elected officials to vote no to any plan that doesn't secure housing, jobs and security for those who need it the most. We expect that you will take our recommendations as seriously as we do.

Please feel free to reach out with any questions you may have. You can call Carmen Vega-Rivera at 718-665-5907 or 917-864-2224 or [cvegarivera1@aol.com](mailto:cvegarivera1@aol.com).

Sincerely,

## The Bronx Coalition for a Community Vision

*The Bronx Coalition for A Community Vision consists of Community Action for Safe Apartments-New Settlement Apartments, Latino Pastoral Action Center, Northwest Bronx Community and Clergy Coalition, Mothers on the Move, United Auto Merchants Association, Faith In New York, Local 79, Plumbers Local No. 1, NYC District Council of Carpenters, Greater NY-LECET, 100 Black Construction Workers, New York State Iron Workers District Council, Insulators Local Number 12....list in formation.*

*The Coalition is supported by: The Community Development Project at the Urban Justice Center, Pratt Center for Community Development, Hester Street Collaborative, The Association for Neighborhood and Housing Development, The Center for Urban Pedagogy, and the Real Affordability for All Coalition...list in formation.*

cc: Council Member Vanessa Gibson, Council Member Fernando Cabrera, Council Member Donovan Richards, Council Member Jumaane Williams, Council Member David Greenfield, Bronx Borough President Ruben Diaz Jr., NYC Comptroller Scott Stringer, Speaker of NYC City Council Melissa Mark-Viverito, Mayor Bill de Blasio, Deputy Mayor Alicia Glen, Vicki Been, Commissioner of HPD, Carl Weisbrod, Commissioner of DCP, Gregg Bishop, Commissioner of Small Business Services, Maria Torres-Springer, President and CEO of NYCEDC.