

Resilient Red Hook



Testimony on Proposed Rezoning at Hamilton Avenue

M1-1 to Mixed-Use Zone Change

March 21st 2026

Position Statement

Resilient Red Hook (RRH) submits this testimony regarding the proposed rezoning of tax lots on Hamilton Avenue from M1-1 to a mixed-use designation. Our organization centers climate resilience, environmental justice, and equitable land use in a neighborhood that has experienced serial displacement—or *root shock*.

RRH is prepared to support this project—but only if the conditions outlined below are met.

We distinguish this stance from unconditional support. Red Hook’s naturally occurring mixed-industry ecosystem—unique in the city—is a resource that does significant work for New York. It sustains pricing in a naturally occurring way that reduces the need for city-subsidized manufacturing. Any rezoning must reckon with that reality. This is not a neighborhood where standard approaches produce good outcomes. Creative, place-specific solutions are required.

The City must ensure that the project and its precedent-setting effects are managed responsibly.

I. Ecosystem Integrity and Industrial Preservation

Red Hook is a geographically isolated, mixed-industry ecosystem. Its zoning is not “consistent”—and that is a feature, not a flaw. Decades of negotiation within that context have built a strong and diverse economic fabric: approximately 700 small businesses, home-based businesses, artists, and freelancers across all sectors, generating roughly 5,000 work trips daily with no institutional anchor. The inconsistency of Red Hook’s zoning is the

mechanism that sustains this diversity. Simplifying it into monoculture will destroy what makes it work.

Spot rezoning will not deliver good outcomes. Rezoning by zoning block—beyond the specific tax lots of this project—is misaligned with good planning in Red Hook. Rezoning further on this block risks property valuations outstripping current use, triggering a domino effect that is the opposite of comprehensive planning.

RRH therefore conditions its support on the following:

1. **Only the project's tax lots are rezoned**—not the entire block. The rezone should match existing out-of-zone housing on the block, not create new precedent for block-wide conversion.
2. **Moratorium on further rezonings in Red Hook** until a community-led, neighborhood-wide zoning plan is developed—aligned with the goals of the existing 197-a plan, which envisions a safe, more prosperous, mixed-income though working-class and mixed-industry community.
3. **No net loss of manufacturing square footage.** Red Hook cannot afford to lose a single square foot of manufacturing space. The new development must maintain the same amount of manufacturing-zoned square footage as currently exists on the site. This is not a preference—it is a condition. With more than 60 acres of IBZ land at risk from the BMT proposal and over 200,000 square feet already lost to fires, every rezoning that reduces manufacturing capacity compounds an irreversible loss. City of Yes ensures almost all uses remain possible within a manufacturing designation; the ground floor must stay zoned manufacturing, and preference must be given to retaining the current use or enabling the current business to return.
4. **No tolerance for empty ground-floor space.** Vacancies signal speculative holding, not community benefit.
5. **Relocation support for existing businesses,** with the right to return. Two recent fires in Red Hook have already wiped out more than 200,000 square feet of below-market manufacturing space that cannot be replaced at below-market rates. Those who have found replacement space are paying 2–3 times their previous rents. We cannot afford to add displacement on top of displacement.

II. Flood and Climate Resilience

Red Hook is one of the most flood-vulnerable neighborhoods in New York City. It sits in a coastal flood zone, faces compounding stormwater and groundwater risks, and is still recovering from Superstorm Sandy more

than a decade later. Any new construction must be built for the climate Red Hook is entering—not the one it is leaving.

RRH requires the following resilience conditions:

1. **Flood-resilient building design.** The project must meet or exceed current FEMA floodplain standards and incorporate the latest NYC projections for sea level rise and storm surge. Mechanical systems, utilities, and residential floors must be elevated appropriately. The project must not worsen drainage or flooding conditions on adjacent blocks.
2. **Stormwater management.** The project must incorporate on-site green infrastructure—permeable surfaces, bioswales, retention systems—sufficient to manage stormwater runoff without adding load to Red Hook’s already overburdened combined sewer system.
3. **Sealed-envelope air quality design.** This site sits at the BQE. Open windows will not be usable for health and noise reasons. The building must be designed as a sealed envelope with high-performance HVAC, air filtration, and ventilation systems that protect residents from highway-adjacent pollution exposure. Red Hook is designated a Community of Concern for environmental justice—design must reflect that status.
4. **Backup power and emergency preparedness.** The building must include emergency power systems sufficient to maintain habitability during extended outages—a Sandy-scenario requirement, not an amenity. Consideration should be given to battery storage, solar, and microgrid integration consistent with the community energy planning RRH has advanced for the neighborhood.

III. Equitable Development and Shared Affordability

The affordability built into Red Hook’s current zoning is a *measurable public resource*. It was not created by the market—it was created by public action and decades of community stewardship. If the City chooses to leverage that affordability through a discretionary zone change to unlock building opportunities, the value generated must be shared equitably among the property owner, the businesses, and the future residents. It cannot be captured exclusively by profit-maximizing development.

In the case of Gowanus, it was the affordability built into manufacturing zoning that was leveraged for housing—but the need to preserve affordability for the manufacturing sector was forgotten, and too much of that value was given away to profit-maximizing projects. Neither Gowanus nor Atlantic Yard are examples to follow. Together, we must learn from them and create an example worth following.

1. **Support local property owners; avoid acquisition costs.** This project works with a local property owner—that is a strength. Moving forward, City programs and IDA incentives must be realigned to support joint ventures that keep existing owners involved and prevent acquisition costs from consuming the built-in affordability of a given lot and project.
2. **Affordability shared across uses.** Affordable housing is essential, but so is affordable commercial and manufacturing space. The project must deliver on both. The failure of MX zoning citywide to produce meaningful manufacturing inclusion is well documented—bottom-line economics make it nearly impossible without targeted incentives and special zoning provisions.
3. **No tolerance for housing vacancies** greater than the city average plus 5%. New housing must serve residents, not speculators.
4. **Design that is decidedly special.** Red Hook is not a blank canvas for generic development. The look, feel, and community integration of this project must reflect the character and aspirations of the neighborhood.

IV. Community Governance and Public Investment

1. **City investment in the Hamilton corridor—now.** Approval of this project must be paired with accelerated City investment in beautification, walkability, and safety along Hamilton Avenue, with meaningful advancement delivered within three years. Hamilton is not a “thoroughfare”—it is a BQE frontage road and tunnel on/off ramp with no pedestrian crossing under or over the highway at this point. The nearby hotel, which relies on the same walking path, is a constant deterrent to foot traffic. Without investment in the public realm, this project places residents in an environment the City has neglected.
2. **Accurate transportation analysis.** The applicant’s own presentation acknowledged the tension between noting that parking is needed “because it’s Red Hook” and citing nearby public transportation. This tension must be honestly addressed. Red Hook has no subway. Bus and ferry service is limited. This is not a transit-rich location, and the project’s transportation assumptions must reflect that reality.
3. **Genuine community engagement.** The conversation at CB6 on this project was wholly insufficient. The word “manufacturing” was not used in either the Land Use Committee or the full board meeting—on a project whose central action is a change from M1-1 zoning. It appears there was no Red Hook representation in these conversations. This cannot be the standard.
4. **B2B displacement acknowledged.** The applicant’s presentation insinuated that because the affected business has other locations and is a B2B chain, the loss of this location does not matter. Service businesses delivering physical materials to job sites often use multiple locations to reduce trip times. Red Hook locations

frequently serve parts of Brooklyn and Manhattan via the tunnel—keeping trips short serves everyone. Dismissing this is dismissing the fabric of the working city.

V. The Broader Context: Why This Matters Beyond One Project

Red Hook faces unprecedented pressure on its industrial land. If the Brooklyn Marine Terminal program moves forward as proposed, the neighborhood stands to lose more than 60 acres of IBZ-zoned waterfront. Two fires have eliminated over 200,000 square feet of below-market manufacturing. Speculation driven by the BMT proposal is already being built into real estate pricing and advertising, eroding the very affordability that sustains the current ecosystem.

In this context, every rezoning action in Red Hook carries outsized weight. This is not one project in a stable neighborhood—it is one project in a neighborhood under existential threat. The conditions we outline are not aspirational; they are the minimum necessary to prevent this project from accelerating harms that are already underway.

New York City must come to grips with the physical nature of many businesses and the economic, social, ecological, and cultural value of having them integrated within the fabric of the city. Pushing creative, service, construction, manufacturing, and light industrial uses to the outskirts deprives our city of the daily interactions that feed New York City life. With continuing downward pressure on office jobs, strong work-from-home culture, and lack of controls over non-local retail impacting small businesses, fueling mixed-industry neighborhoods is simply wise.

Good data and valuation of these sectors is sorely lacking. City-funded Commercial District Needs Analyses do not count businesses in shared overhead rentals, suites, studios, or above-ground-floor spaces without walk-in access—leading to significant undercounting. City-contracted Live XYZ, which claims to map every business on every block, does not include *any* categories related to industrial, construction, fabrication, manufacturing, or B2B services. The business at the address in question is unmapped. These are not neutral gaps—they are blind spots that make it easier to rezone away what the City cannot see.

Conclusion

Red Hook must continue to serve manufacturing. This is not negotiable, and it is not in tension with housing. In Red Hook, we do not need to choose

between housing and manufacturing—we can and must serve both. The diversity of our economy is what sustains our neighborhood: the small fabricators, the service businesses, the construction suppliers, the artists, the food producers working alongside the families and long-term residents who call this place home. One does not thrive without the other.

The question before us is whether the City will treat this project as proof that both can be done well—or as one more instance of trading manufacturing away for housing, as if the two were interchangeable. They are not. Red Hook’s mixed-industry ecosystem is a public resource that generates jobs, tax revenue, and neighborhood stability. Housing built on the erasure of that ecosystem is housing built on a hollow foundation.

RRH is prepared to support this project if and only if the conditions outlined above are met. We urge the City, the applicant, and our elected officials to show that Red Hook can grow its housing and protect its working economy at the same time—because that is the only version of this project worth building.

We look forward to working with our local and city partners to make that case—together.

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Chair

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