



THE CITY OF NEW YORK **COMMUNITY BOARD SIX**

Marty Markowitz
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October 26, 2006

Meenakshi Varandani
Assistant Vice President, Planning
New York City Economic Development Corporation
110 William Street
New York, New York 10038

Dear Ms. Varandani:

In response to the New York City Department of Small Business Services' (SBS) September 8, 2006 Combined Positive Declaration, Notice of Intent to Prepare a Draft Environmental Impact Statement (DEIS) and Notice of Public Scoping Meeting for Brooklyn Piers 7-12 (CEQR 06SBS009K) we submit to you the following statement containing the issues that must be addressed in the final scope of work for the project.

In developing these comments Brooklyn Community Board 6 (CB6) held a very well-attended combined public meeting of our Economic/Waterfront Development, Landmarks/Land Use and Transportation Committees on September 28, 2006. We also attended and provided oral testimony at the Scoping Session Public Hearing on October 12, 2006. Furthermore, as you know, we have been working intensively with the City's Economic Development Corporation (EDC) over the past 2 years and had previously supported a set of Guiding Principles designed to further the planning discussions around this important site.

We acknowledge that EDC has spent a great deal of time and effort with us and our community in discussion on the future of our waterfront. Our comments on the Scope of Analysis for the DEIS should reflect the fact that our community has some very strong views on what should and should not happen at the waterfront. As a result, we see the DEIS as the primary opportunity for the City to take a hard look at some of the more controversial aspects of the proposed actions so that we can use that information to better inform any decisions made down the line. We are hopeful that SBS and EDC will see the merits in our suggestions and will amend the draft scope accordingly, including but not limited to the following:

Task 1. Project Description.

- No comment

Task 2. Land Use, Zoning, and Public Policy.

- Within the context of land use and public policy we need to see that ample consideration has been given to the question of whether to close or otherwise restrict the last remaining operating port on the eastside of the New York Harbor. As mentioned by numerous speakers at our meeting and your Public Hearing the implications of this action must be clearly considered. The DEIS should examine this issue and present an in-depth analysis of any resultant shift in the movement of goods and freight throughout the region. The DEIS must include figures on how much freight is moved through the region currently, how much is expected to move through as a result of the proposed actions, and the net affect of any changes including but not limited to its impact on truck traffic, jobs, environmental impacts, etc. We would expect some aspects of this public policy decision to be studied in greater detail in other sections of the DEIS (such as the truck traffic impacts being examined closely in the section on Traffic and Parking), but a generalized consideration of this public policy decision should be included within this task.
- Also as a matter of public policy, it is important for the phasing and sequencing of the proposed development to be analyzed and disclosed as part of the EIS. The development of some of the Parcels may need to happen in an ordered way due to construction and/or fiscal impacts. We suggest that consideration be given to the idea that Parcel M, the most upland portion and arguably one of the most controversial elements of the proposed development, be developed among the last phases of the build-out period to give the agency sufficient time to engage the community in a more focused planning effort at that particular site as we suggested in Task 21, Alternatives.
- The EIS must also consider the effect of the disposition of the proposed Parcels for the sake of public policy. Retaining public control of this stretch of waterfront property is something that has historically been extremely important to our community and the loss of such control, particularly without expressed covenants and use restrictions, is something that prompts a closer look at what could be lost by giving up control of the site.

Task 3. Socioeconomic Conditions.

- Within the Housing Characteristics section we would like to see a detailed analysis of the trends in housing development in the Columbia Street District and Red Hook, to include the entirety of both neighborhoods which extend slightly beyond the study area. It would be useful for us if a supplemental housing study of both neighborhoods were generated that could help identify other neighborhood sites beyond the project location that would be suitable for the development of housing.
- Within the Economic Characteristics section we hope to see a detailed accounting of the types of jobs (i.e., manufacturing, retail, support services, professional, etc.) that would be created and the types of jobs that would be displaced by the proposed development.
- Within the section on Direct Business Displacement it would be appropriate for a more extensive analysis of the impact of the proposed actions on the existing containerport operations as we've requested in the above item with particular consideration given to the

possible relocation of a container operation to the Sunset Park waterfront to the south of our district as had been suggested by numerous parties.

- Within the section on Indirect Business Displacement it would be appropriate for a more extensive analysis of the recent trends in retail and commercial development taking place within the study area to ensure that any of the proposed development be compatible, complimentary and supportive and not competitive with the general trends within the community.
- Within the Economic Benefits section, or as its own free-standing section, it is important to identify any associated Economic Costs of any proposed development (direct and indirect, public and private, construction and operating) so that costs and benefits can be juxtaposed and examined together. Construction project costs should include, but not be limited to, loss of mobility and access particularly to local businesses, increasing demand on public safety resources, cost of temporary traffic mitigation plans, loss or diversion of public transportation, and actual construction costs for the proposed development, etc. Beyond these construction costs, the operating costs must be similarly disclosed to include, but not be limited to, the maintenance of the cruise ship facilities and other proposed development, the need for additional emergency and uniformed municipal services, maintenance of the new infrastructure needs, development and maintenance of any other new municipal facilities that may be suggested by the EIS, and the cost of relocating any existing operations within the project area.

Task 4. Community Facilities.

- While pleased to see that a detailed analysis of the impact of the project on local schools will be undertaken we would like to see a similar analysis performed for publicly funded day care centers as well. Though it has not yet been determined whether such an analysis will be triggered, since the Columbia Street District currently has no publicly funded day care centers and this has been a priority of ours for many years, we would appreciate such an analysis as part of this project to demonstrate to the appropriate City agencies that, as we have been trying to explain to them over the years, we have a pocket of unmet need within our district in this neighborhood.
- Even though the Reasonable Worst Case Development Scenario (RWCDs) calls for a maximum of 350 new residential units, and it would take 734 units to trigger an in-depth review of the project's impact on libraries, through the development of multiple phases of new housing as called for in the City's Columbia Street Urban Renewal Plan we have already absorbed in excess of this threshold within the project's study area. We would like to see an analysis of the project's impact on library services.
- Fire and police protection, though typically triggered by project's potential impacts on response times need be considered as the type of development envisioned for this site would be a unique and considerable regional generator of residents, workers and especially visitors. Such special characteristics may warrant that on-site or proximate provision of fire protection services for example be considered, particularly for the safety and protection of the cruise ship terminal.

Task 5. Open Space.

- Within the context of the Open Space analysis that will be performed we would like to see consideration given to the utilization of a portion of Parcel M, specifically the westside of Columbia Street between Kane and Degraw Streets, to being used as open space as an alternative development scenario.

Task 6. Shadows.

- No comment.

Task 7. Historic Resources.

- No comment.

Task 8. Urban Design and Visual Resources.

- As noted repeatedly by speakers at our meeting and your Public Hearing, the impact of the development of Parcel M on the urban design and especially the visual resources to the area is something that raised a great deal of concern. Particular attention and consideration must be paid to this point particularly given the potential heights of new buildings being proposed.

Task 9. Neighborhood Character.

- Perhaps most central to this proposed development is the general impact it will have on its surrounding communities and its affect on neighborhood character. Both Red Hook and the Columbia Street District are mixed-use communities where strong residential and significant maritime and industrial communities have co-existed for well over a century. It is critical that any proposed development considered for this site respect these elements of the neighborhoods and be viewed as harmonious and compatible within this context.

Task 10. Natural Resources.

- No comment.

Task 11. Hazardous Materials.

- No comment.

Task 12. Waterfront Revitalization Program.

- No comment.

Task 13. Infrastructure, Energy and Solid Waste.

- No comment.

Task 14. Traffic and Parking.

- The definition of the traffic study area should be expanded beyond what is proposed. The proposed development taken together is a regional generator of traffic. It will likely have impacts extending beyond the Columbia Street District and Red Hook into the nearby neighborhoods of Cobble Hill and Carroll Gardens and possibly Brooklyn Heights. As such, the eastern boundary of the traffic study area should be extended to include consideration of the project's impacts on Court and Smith Streets, the area's predominant north-south travel streets. Specific intersections at Court/Atlantic, Smith/Atlantic, Court/Congress/Bergen, Court/Union, Smith/Union, Court/Sackett, Smith/Sackett, Court/Degraw, Smith/Degraw should be included. The southeasterly border of the traffic study area should be extended to include the Hamilton Avenue Bridge which will be undergoing simultaneous reconstruction during the build out period and will likely result in a cumulative impact to the area. Specific intersections at Smith/Hamilton, Court/Hamilton and Clinton/West 9th/Hamilton, Lorraine/Otsego, Wolcott/Dwight and Wolcott/Richards should be included.
- Also, as previously mentioned in our comments on Task 2, we would like to see particular attention given to the proposed development's impact on truck traffic specifically since the project impact will likely result in a shift in the movement of freight and goods through the region, both in terms of what the project would attract and what it would potentially displace. Our Red Hook neighborhood especially has been most sensitive to truck traffic impacts on the community and a thorough analysis is essential for us to determine whether the proposed development would net a positive or negative impact.

Task 15. Transit and Pedestrians.

- Public transportation access to the project site currently is seriously lacking. With no subway service and only limited bus service (B61, B63, B71 and B77 going into the project area) the challenge is compounded further by the lack of east-west connectors spanning the Brooklyn-Queens Expressway trench at Hicks Street which further constricts mobility throughout the region. Future actions suggested by the Metropolitan Transit Authority included the wholesale removal of some of these bus lines. A very detailed analysis of the project induced impacts will be critical to ensuring that the area's current challenges are accurately depicted. A full disclosure by the MTA of any plans under consideration to remove or reduce service along these bus lines will be necessary for this analysis to be complete.

Task 16. Air Quality.

- No comment.

Task 17. Noise.

- The residential development envisioned for Parcel M will create the closest residential receptors for noise impacts. Regardless, residential uses along the eastside of Columbia

Street are already in place and will be impacted by project induced noise generated. Consideration must be given to how the noise from uses envisioned in the proposed development, particularly the continued maritime industrial uses which has widespread popular support, can be buffered from the existing and contemplated residential uses.

Task 18. Construction Impacts.

- No comment.

Task 19. Public Health.

- No comment.

Task 20. Mitigation.

- Brooklyn Community Board 6, as an agency of the City of New York with planning responsibilities specific to the subject project location, should be included as one of the agencies that will be responsible for developing practicable mitigation measures in close coordination with the other agencies already listed.
- SBS/EDC must develop a mechanism to ensure that mitigation measures called for by the EIS are actually carried out, with a clear delineation of public and private responsibilities, dedications of funds, public authorizations, etc.

Task 21. Alternatives.

- In addition to the “build” and “no build” alternatives, some consideration should be given to the development of Parcel M in particular for a variety of uses. In spite of the proposal to use the north end of Parcel B as a site for open space recreational use, there is a strong sentiment in the community that Parcel M in some way also perform a similar function. The range of development options for Parcel M should be studied from the RWCDs to a “no build”/open space alternative.

Task 22. Summary EIS Chapters.

- No comment.

Task 23. Executive Summary.

- No comment.

Thank you for the opportunity to comment.

Sincerely,

Jerry Armer
Chairperson

cc: Hon. Michael Bloomberg
Hon. Marty Markowitz
Hon. David Yassky
Hon. Sara M. Gonzalez
Hon. Bill de Blasio
Hon. Joan Millman
Hon. Martin Connor
Hon. Nydia Velázquez
Hon. Jerrold Nadler
Josh Sirefman, President, NYCEDC
Commissioner Robert Walsh, SBS
Commissioner Amanda Burden, DCP
Regina Myer, Director, DCP/Brooklyn Office
Joseph Palmieri, Borough Commissioner, DOT/Brooklyn
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