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Meenakashi Varadani
Assistant Vice President, Planning
NYC Economic Development Corporation
110 William Street
New York, NY 10038

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Executive Director
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Re: Comments on Scope of DEIS, CEQR # 655009K, Piers 7-12, Brooklyn

With little public attention, a massive redevelopment of Piers 7-12 has been proposed by New York City that will forever change the Brooklyn waterfront and greatly affect the character of adjacent neighborhoods. The project is twice the size of the actual land area of the contiguous Brooklyn Bridge Park, with many more travel generators, and five times the size of the controversial Atlantic Yards development. Having been abroad and getting no advance notice of the Public Scoping meeting on the DEIS on October 12th, I, nevertheless, attended, but lacked the stamina of my very articulate neighbors to wait to be called to speak. Thus, even though these comments are submitted past the official October 26th deadline, I urge that they be considered, lest they re-emerge to challenge a defective DEIS.

While I concur with the October 26th comments of Community Board 6 on Traffic and Parking and Transit and Pedestrians, I feel they did not go far enough. Nor do they fully reflect the lessons we all have learned from recent environmental reviews in the area that fail to disclose true impacts. In focusing on just transportation issues, I wish to point out some oversights in CB 6's more comprehensive statement which, I believe, reflects their oft-expressed views.

- 1) In addition to all the intersections cited by CB6, the study area must include the principal artery serving the site, the Brooklyn-Queens Expressway. Undoubtedly, the DEIS will, like those before it, assign a major portion of project trips to the BQE, but will ignore the impact of this project on the BQE's operations and, consequently, the effect on adjacent local streets. We have repeatedly reminded the DEIS preparers that the NYCDOT has vehemently reported that the BQE is at capacity for extended peak periods and that any trips assigned to the BQE will either be forced to use local streets or force a current user to do so. The proposed omission of examining impacts on the BQE is an unconscionable abdication of professional responsibility, permitted by NYC CEQR in defiance of its own Technical Manual, pp. 3O-3 to 3O-4.
- 2) Assessing the role of and impact on the BQE of the project is particularly urgent because of the foreseeable long period of reconstruction of the Gowanus Expressway and the Brooklyn Heights cantilevered section. The BQE is the most critical goods delivery route in the city, carrying more freight traffic than the NJ Turnpike, a burden that is forecast to double by 2025. The regional economic impacts of further congesting the artery must be known for any official to formulate an informed opinion on supportable land uses.
- 3) Of course, the antiquated simplistic Highway Capacity Software used in CEQR EISs to analyze intersections is inapplicable for estimating mainline highway queuing impacts, which requires the use of a traffic simulation model, preferably CORSIM.

- 4) The use of the companion traffic operations model, SYNCHRO/SimTraffic for a logical local roadway network would be far more representative of the study area than a laundry list, however long, of intersections. The function of Furman Street, with both one and two way operation must be clearly understood. Redrawing the study area should include the approaches at both the Manhattan and Brooklyn ends to the Manhattan and Brooklyn Bridges, because close analysis of the Brooklyn Bridge Park EIS revealed that the significantly less traffic expected to be generated by the Park will back up traffic on Manhattan approaches to the Brooklyn Bridge. The likely increase in commercial traffic from Piers 7-12 will affect the entirety of Atlantic Avenue, the de facto truck route for oversized vehicles forced off the BQE by height limitations on the underside of the BQE at the north end of the Promenade.
- 5) Obviously, travel patterns would be dramatically different if congestion-based user fees of all entries to Manhattan were instituted, a scenario that could alter travel pattern of approximately 40% of motorists now moving through Downtown Brooklyn attracted by the free crossings, according to a NYCDOT report. Assessing the effect of this potential measure on road capacity must become a standard element of every EA or EIS to build a base for informed decisions on an issue we all must face dispassionately. The prospect cannot cavalierly be brushed aside in this EIS as “beyond the scope of this project.”
- 6) More than ever, the credibility of the DEIS rests on realistic trip generation factors. It is patently unacceptable to use 30 year old surveys of midtown Manhattan sites with low auto ownership and nearby transit and walkable destinations to forecast trips to this waterfront site, distant from transit and most origins. As repeatedly urged by CCS, the Borough President and community boards, new Brooklyn-based surveys of representative sites must be the basis of this DEIS. Mode split assumptions must consider not just the distance from subway stations but also the lack of a direct connection between the numbered lines and the fairly insular F train and long waiting times of both the F and the G.
- 7) The proposed passive approach to the assessment of bus ridership is entirely unacceptable. Since in the absence of any inclusive planning in New York City, a DEIS is the closest we get to identifying and meeting needs, it must be more proactive in evaluating alternative proactive bus strategies, including:
 - consultation with CB 6’s Transportation Committee on desired routes, most obviously connecting subway stations and the waterfront.
 - restructuring extended routes into more logical segments, e.g., the B61 which goes from Van Brunt Street to Queens Plaza serves no identifiable origin-destination and, due to its length is particularly prone to delays which result in severe bus bunching.
 - equipping all buses with off-the shelf GPS bus-tracking and radio communication systems, which, even without dedicated lanes, can regularize bus arrivals and advise riders of waiting times.
 - instituting bus service from the waterfront to Manhattan through the Brooklyn Battery Tunnel
 - designing Bus Rapid Transit routes into existing and new streets.
 - preserving adequate right-of-way for a future light rail system, commonplace in European cities a fifth the size of Brookyn.

- 8) The most striking feature of European (and some U.S.) waterfronts, the central place of pedestrian access, is entirely absent in what is called a “plan” for Piers 7-12. With a nod towards assessing high hazard areas, pedestrians are relegated to accommodating vehicles, when waterfronts elsewhere succeed by doing just the opposite. The major challenge will be providing convenient safe pedestrian access to the Piers. CB #6 members have become astute traffic calming planners whose insights should be the starting place for designing connecting routes and new street systems. Instead, predictably, the DEIS lavishes many pages calculating the density of pedestrians on sidewalks and crosswalks, as if this were somehow undesirable. People like to be with other people, as long as they are walking, not driving.
- 9) In fact, it looks like Piers 7-12 are intended to outdraw Brooklyn Bridge Park, with the meaningful active recreational facilities, waterside cafes and attractions now stripped from the Park to accommodate four times as much luxury housing as the “mixed use” Piers 7-12. The linkages and spill over effects of the Piers on the Park, such as on parking, must be examined. Since the community’s proposal for a multi-modal transportation hub on Pier 6 was rejected, perhaps it can be built into Parcel A in this plan. Or better, re-think and re-allocate land uses between the two projects.
- 10) The starting place for more rational planning should be the dominant existing structure: 360 Furman Street—the squandering of the one likely hurricane-proof structure on the waterfront on redundant luxury housing (in a park, no less!) to bail out a political favorite. In the vast backroom that substitutes in this city for planning, born-again planners could exchange floor area of housing in 360 Furman for the more park-like uses now, ironically, designated for Piers 7-12: indoor recreation, marina, beer garden, cafes, etc.

The missing element in both plans is the year-round drawing power of an aquarium, which is a key feature of the appeal of Baltimore, Boston and Barcelona’s waterfronts to name just a few. This could be a ferry-linked satellite to the wonderful but remote Coney Island Aquarium. Or it could be a cost-effective alternative to building an attention-getting shell in the hope that the Coney Island Aquarium, hidden by the Boardwalk and parking lot, might catch up to its counterparts in more central water-connected locations.

In any case, cities like Seattle, a heavy duty Pacific port, and Barcelona, the busiest Mediterranean port, demonstrate that, with thoughtful planning and investment in infrastructure as a *condition of development* (rather than an afterthought), industrial maritime activities can thrive side by side with public waterfront activities. This never-to-be-recovered opportunity to do so on Brooklyn’s prime waterfront must not be the victim of the narrow confines of the CEQR process.

Sincerely yours,

Brian Ketcham, P.E.
Executive Director

cc: Elected officials, community leaders and the media