

**COMMENTS ON THE ATLANTIC YARDS DRAFT ENVIRONMENTAL
IMPACT STATEMENT BY BOROUGH PRESIDENT MARTY MARKOWITZ**

SEPTEMBER 28, 2006

The Office of the Brooklyn Borough President prepared these comments with the goal of providing the lead agency, the Empire State Development Corporation (ESDC) and the developer, Forest City Ratner Corporation (FCRC), with obtainable and practical recommendations for improving the Atlantic Yards Project. This approach is beyond the typical parameters of standard EIS comments. However, numerous and skilled community stakeholders and professional experts, having carefully critiqued the EIS and supporting documents, will submit thoroughly detailed analyses. While the Borough President felt it superfluous to replicate these efforts, it is his hope that ESDC will heed the invaluable work of stalwart community activists and planning advocates such as the Regional Plan Association, the Council of Brooklyn Neighborhoods and many others.

D. PREPARATION OF AN ENVIRONMENTAL IMPACT STATEMENT

TASK 3. LAND USE, ZONING AND PUBLIC POLICY

The proposed project's scale, while compatible with the buildings north of the project site in Downtown Brooklyn, must relate to the surrounding brownstone neighborhoods to the south of the project site as well. In particular, the FEIS should explain how the massing for Site 5 relates to the density of the Boerum Hill/Park Slope Fourth Avenue corridor. Also the FEIS should examine Building 3 in terms of its relationship to Prospect Heights and Building 6 in terms of its relationship to Newswalk and Atlantic Village, Atlantic Avenue fronting buildings.

TASK 4. SOCIOECONOMIC CONDITIONS

Direct displacement analysis should include the number of homeless families and individuals residing in institutions or multi-family housing earmarked for homeless housing. The FEIS should disclose statistics related to the ethnic characteristics of this population and direct and indirect costs of relocating families.

Analysis of real estate trends should utilize census data, discussions with local real estate firms, discussions with local non-profit housing corporations and recent sales research to determine trends in rent sales prices, vacancy and tenure. The FEIS should establish a baseline displacement rate that reflects how the community has changed significantly in the five years since the last census.

The FEIS should estimate the net new job gain or loss in New York City and Brooklyn attributable to the project.

The DEIS reasons, but does not prove, that the current real estate trends would lead to higher real estate costs in the area with or without the project. The FEIS should provide the projected, no action real estate values and the projected real estate values with the project to determine if it will cause increased indirect displacement.

The DEIS analysis of neighborhood income levels uses medians and averages and thus fails to accurately show the distributions on either side of middle. Analysis using these numbers can provide inaccurate definitions in neighborhoods that have a broad range of incomes, such as the communities surrounding the project site. The FEIS should include an analysis of income distribution in order to determine accurately whether households have incomes close to the median or whether there are sizable segments with incomes much lower or much higher than the median.

TASK 5. COMMUNITY FACILITIES AND SERVICES

The DEIS states that for the mitigation for the increased elementary and intermediate school children within a half-mile of the proposed project, a combination of measures could be taken including the building of a school. Building 5 has been mentioned as a possible site for a new school. The FEIS and Forest City Ratner, in coordination with the Department of Education, should confirm and commit to building this school.

To ensure public safety in the study area, the FEIS should include the recommendation to build a Police Department sub-station. Clearly, the advent of the 911 system and improved dispatching has led to more efficient police deployment. However, in terms of providing a palpable sense of safety in a busy public place, the Borough President asserts that nothing quite compares to a physical presence similar to the Times Square Police Department sub-station. Moreover, the DEIS notes that the NYPD has protocols to manage large venues such as Yankee Stadium and that policing these events will not detract from local precincts. There is no evidence that this claim, as it applies to the Atlantic Yards arena, is reasonable.

TASK 6. OPEN SPACE

The Borough President is cognizant of the fact that the proposed action will bring needed parklands to the study area, which is in dire need of parks, as the open space accounts for nearly one-third of the 22-acre site. However, the DEIS does not adequately disclose whether the proposed seven-acres of open space will be designed and managed in a fashion which is inviting and accessible to the public. Moreover, the GPP design guidelines need to be flexible to create better parkland.

In order to make certain the proposed project's open space best serves the surrounding communities, the Borough President suggests that that the developer, Forest City Ratner Corporation, solicit the opinions of representatives from the NYC Parks Department, Community Board 2, Community Board 8 and local community stakeholders.

Furthermore, DEIS does not disclose how the open space, created as part of the build action, will be operated and managed. The Borough President adamantly believes in order to ensure the proposed project's open space remains in perpetuity, it must be owned and operated by an entity separate and apart from the developer, giving preference to a citizen conservancy.

Additionally, other aspects of the open space conceptual design, especially the concentration of the active park uses such as the playgrounds and volleyball courts on blocks 1121 and 1129 instead of the more connected and centrally located block of 1120, seem to reinforce a two-tier or bifurcated park system. Visitors will be relegated to the open space in closest proximity to the proposed project's most significant attraction, the arena, which is nearly exclusively for passive use (e.g. benches, planting beds, etc.) while myriad recreation destinations, situated in the interior of the 1121 & 1129 superblock, appear only available to those individuals, most likely condo residents, "in the know" or highly familiar with the site. In other words, the lack of substantial connections, visual or physical, between the western portion parklands on block 1120 and the open space on blocks 1121 and 1129, means potentially the proposed project's open space will not function as a single, consolidated park but a compartmentalized series of pocket parks and plazas.

TASK 7. CULTURAL RESOURCES

While the DEIS refers to the neighborhood of Boerum Hill, it does not reference the Boerum Hill Historic District. The FEIS should correct this omission and cite the Boerum Hill Historic District in Table 7-2.

Also, the FEIS should reflect investigation as to whether the study area site has remains of early African-American and Native-American settlements that developed around Atlantic Avenue and possibly continued into the late 19th century.

TASK 8. URBAN DESIGN AND VISUAL RESOURCES

While the proposed project's buildings on the western edge would be of scale similar to Downtown Brooklyn, the FEIS should also acknowledge these buildings in context to low-rise character of the brownstone neighborhoods of Boerum Hill, Park Slope and Prospect Heights.

The Borough President does not concur with the statement that views along the tree-lined streets would not be affected by the proposed project. In fact, in the winter and early

spring, views from the south side of Pacific Street looking east and from the east side of Sixth Avenue looking north would indeed include views of the project site. Therefore, such conditions should be analyzed in the FEIS.

The FEIS should also consider how the proposed project would impact the skyline view from the Mount Prospect Park playground overlook. The FEIS should acknowledge that in becoming a new visual element and wayfinder, Building 1 may diminish views of the Williamsburg Bank Building from many locations. Moreover, Building 1 should not be taller than 512 feet.

Also, the Borough President believes the heights of Building 3 and the building on Site 5 will result in a significant impact. Building 3 deviates too much from the neighboring brownstones across Dean Street and from what can be viewed both along the Dean Street corridor and the Dean Street Playground and the Sixth Avenue corridor as it extends into Park Slope. Site 5 deviates too much along the Fourth Avenue boundary of the site from the brownstones extending along Pacific Street into Boerum Hill and the intended 12-story “Brooklyn Boulevard” envision and as zoned along Fourth Avenue. The FEIS should contain an analysis of how the tower element of Building 6 relates to the Atlantic Village homes fronting Atlantic Avenue; and, the light and air of the apartments in the Newswalk building.

In Figure 8-39, the view north on 6th Avenue from Dean Street is from the perspective of the middle of the street and above the height of a pedestrian. It does not effectively demonstrate the changes in visual quality. The FEIS should include a revised view drawn from the easterly sidewalk at eye level of 6th Avenue to give a better sense of the relationship of Building 3 to Prospect Heights.

Similarly, Figure 8-40, the view east on Dean Street from Carlton Avenue, does not provide an optimal view as its perspective is from the middle of the street. The view should be drawn from the southerly sidewalk of Dean Street to give more of a sense of the proposed project.

Also, Figure 8-45, the view northwest on Flatbush Avenue from Prospect Place, does not provide a useful vantage point as it is from the perspective of the middle of the street. The view should be photographed instead from the southwesterly side of Flatbush Avenue at Sixth Avenue to give a better sense of the relationship of Building 3 to low-rise brownstones of Park Slope.

The FEIS should include illustrations or photos that will depict the proposed condition for the following points of orientation:

- *North along the western side of Fourth Avenue from Bergen and Wyckoff Streets*
- *East along the southern side of Pacific Street west of Fourth Avenue*

Such photos should also assume sites identified in the Environment Assessment Statement (EAS) prepared by the NYC DCP for its Park Slope rezoning application, as being constructed pursuant to the R8A zoning district. This view would give a better

sense of relationship of Site 5 to the evolving “Brooklyn Boulevard” along Fourth Avenue.

- *South along the eastern side of South Oxford Street at South Oxford Park*

This view would give a better sense of the relationship of the Atlantic Village townhouses to Building 6.

- *West along the south side of Dean Street at the Dean Street Playground*

This view would give a better sense of relationship between Building 3 and Prospect Heights.

TASK 9. SHADOWS

While the proposed project strives to accommodate growth in a compact, high urban environment, shadow impacts can affect landscaping, the beneficial use of surrounding parklands and sunlight-sensitive architectural resources such as century-old stained glass windows.

Moreover, the Borough President is especially concerned about the affects the project’s shadows will have on existing open space such as South Oxford Park and the Brooklyn Bears Garden. While the DEIS demonstrates minimal impacts on these sites, the proposed project would have significant adverse impacts on the open space of the Atlantic Terminal Houses and the stained glass windows of the Church of the Redeemer.

While the DEIS does identify site-based mitigations such as relocating the passive seating area to a section of the open space of the Atlantic Terminal Houses with more sunlight and replacing an semi-opaque screen currently used to protect the Church of the Redeemer’s stained glass, the Borough President believes shadow impacts could be further ameliorated through the reduction of the heights of Buildings 1, 3, 6 and the building proposed for Site 5.

TASK 11. INFRASTRUCTURE, ENERGY AND SOLID WASTE

The Borough President is very concerned about the affects the proposed project will have on sanitary wastewater treatment, combined sewer overflows and the Gowanus Canal/ East River water quality. Unlike the majority of municipalities elsewhere in the United States, Brooklyn and the rest of New York City has an antiquated combined sewer system - designed to collect both wastewater and storm runoff in the same pipes. During dry weather, the sanitary wastewater flows to the Red Hook Water Pollution Control Plant (WPCP) where it is treated before being discharged into the East River. During wet weather, the runoff from storm water exceeds capacity and overwhelms the treatment plant. The combined sewer system is designed to overflow during rains and discharge excess wastewater directly to New York Harbor and other waterbodies.

The proposed project site is within the watershed of the Gowanus Canal, which already receives an unduly amount of combined sewer overflows (CSO) including eight permitted CSOs from the Red Hook Water Pollution Control Plant (WPCP) service area,

four permitted CSOs from the Owls Head WPCP service, and CSOs from the Gowanus Pumping Station at Butler Street. This results in a significant increase in the amount and frequency of pollutant discharges to the waterbody during wet weather and has a significant effect on water quality and aesthetic conditions in the Gowanus Canal. It stands to reason that residents and community stakeholders are wary that the proposed project will exacerbate an already dire situation.

Fortunately the DEIS shows the proposed project will have no adverse affect on infrastructure due to local improvements to the local sewer and water mains and on-site stormwater management techniques such as retention tanks. While the developer's commitment to making the project "stormwater neutral" avoiding CSO and water quality impacts on the Gowanus Canal, the FEIS must disclose how this voluntary measure will be implemented. The proposed project's stormwater management plan is intricately linked to the NYCDEP's multi-year and seventy million dollar plan to upgrade the Gowanus Flushing Tunnel and the Gowanus Pumping Station. It is imperative the FEIS disclose the construction schedule for these improvements.

The Brooklyn Borough President shares the concern of many residents that the project could result in dirtier streets and put strain on both the NYC DOS and private carting services. As the Borough President requested, the DEIS includes an analysis of the type and volume of garbage that will be generated by the project; including any additional NYC DOS and private carter truck traffic; and, the affect of the project's waste on the proposed Hamilton Avenue Marine Transfer Station and private commercial transfer stations.

The DEIS clearly demonstrates that while the project, as expected, will generate a significant amount of waste (24 tons per day), this amount "...is the equivalent of 0.1 percent of the total amount of solid waste currently handled each day in New York City." Therefore, the affect on the Hamilton Avenue Marine Transfer Station would be only one additional truck load per day and an equivalent amount to a private commercial transfer station.

Atlantic Yards, along with Atlantic Terminal across the street will become Brooklyn's great hub, similar to Times Square or London's Trafalgar Square. As such many thousands of pedestrians will pass through the area each day and are sure to produce their "fair share" of litter. The Borough President reiterates his request that the FEIS include an analysis and impact on street and sidewalk cleaning operations. Further, the FEIS should describe the resources that it will provide to insure the cleanliness of the area's streets and sidewalks. Residential and commercial waste should, in all cases, be stored within buildings and not on sidewalks or other walkways visible to the public.

TASK 12. TRAFFIC AND PARKING / TASK 13 TRANSIT AND PEDESTRIANS

Traffic Improvements

The Borough President believes that the movement of traffic into, within and through Downtown Brooklyn is one of the area's most intransigent problems. The challenge for the City of New York is to implement the multi-modal controls and improvements needed to ameliorate and mitigate the project's transportation impacts.

The study area designated in the DEIS does not consider some of the recommendations previously made by the Borough President. In order to accurately assess the proposed project's traffic mitigations, the Borough President recommends the NYC DOT analyze all the intersections in the DEIS and the additional intersections listed below six months after the completion of Phase 1:

Cadman Plaza West / Tillary Street	Plaza Street/Vanderbilt Avenue
Jay Street/Tillary Street	Lafayette Street/Vanderbilt Avenue
Jay Street/Joralemon Street	Park Avenue/Washington Avenue
Jay Street/Schermerhorn Street	Myrtle Avenue/Washington Avenue
Pacific Street/Hoyt Street	DeKalb Avenue/Washington Avenue
Pacific Street/ Nevins Street	Fulton Street/Washington Avenue
Lafayette Street/Fulton Street	

There are streets outside the study area that link communities to the study area that will be affected by the project. The Borough President also suggests the NYC DOT analyze the following streets within Community Boards 2, 6 and 8 six months after the completion of Phase 1:

Court Street	Classon Avenue
Smith Street	Park Avenue
Third Avenue	Myrtle Avenue
Fourth Avenue	DeKalb Avenue
Prospect Park West	Lafayette Avenue
Flushing Avenue	Eastern Parkway
Vanderbilt Avenue	Bedford Avenue
Washington Avenue	Nostrand Avenue

The Downtown Brooklyn Traffic Calming Project (DBTCP), conducted by NYCDOT with the assistance of the DBTCP Task Force in response to community needs, was developed to protect residential areas adjacent to the civic and commercial core of Downtown Brooklyn from the affects of increased traffic. NYCDOT is implementing the DBTCP results. The DEIS states that "no specific measures have been identified for implementation within the study area at this time." In fact, the NYCDOT website includes a listing of such improvements. As the City is committed to implementing the DBTCP by 2009, the effects of these improvements on the performance of the traffic

network should be incorporated as part of the FEIS analyses for both (2010 and 2016) build years.

The DEIS identifies several local arterials and streets having the potential for queuing and spill-back along the principal streets serving the project site. On these streets, over capacity conditions would hamper the movement of vehicles, and contribute to the diversion of vehicles onto local residential streets. The DEIS identifies potential overcapacity conditions on Flatbush Avenue, Fourth Avenue, Atlantic Avenue, and Vanderbilt Avenue, and at the Adams Street/Tillary Street intersection. However, the DEIS does not adequately address the affects of traffic spillover onto residential streets. To address these effects, the FEIS should examine the NYCDOT's traffic calming proposed measures to reduce thru-traffic on residential streets.

The DEIS should test their ability to control traffic effects on local communities under future (2010 and 2016) conditions, and complement the DBTCP measures being implemented by developing, testing, constructing and otherwise implementing traffic calming measures outside the DBTCP implementation area, particularly in Community Board 8, including Vanderbilt Avenue.

To oversee the increasing congestion in Downtown Brooklyn that is likely to result in the future, it is recommended that an area-wide traffic surveillance system, incorporating closed circuit television (CCTV) and other technologies, be implemented for quick reaction traffic management.

Parking Improvements

Nothing is as controversial in Brooklyn as parking. Parking is a paramount concern to the Borough President. He believes that solutions must be found that work for the residents of all the Downtown Brooklyn neighborhoods, including Prospect Heights, Fort Greene, Boerum Hill and Brooklyn Heights.

The DEIS analyzed the demand for off-street parking within one-half mile of the project site, and provide a plan to develop remote parking locations and feeder bus service and other marketing enhancements to provide adequate parking during peak parking demand periods.

With regard to on-street parking, the DEIS provides a study area of only one-quarter mile from the project site. As the demand for on-street parking by visitors to the development and arena are likely to overwhelm on-street parking and displace local residents and establishments, the FEIS should expand the study area for on-street parking to within one-half mile of the proposed project.

To that end, the Borough President would like the developer to explore the following recommendation to increase the availability of parking to local residents. Residents, whose on-street parking would be displaced within one-quarter mile of the project site, should be provided free or inexpensive overnight parking in the project's off-street

parking facilities on event nights. This recommendation would provide the displaced residents a remedy, or “parking of last resort” within the project site.

As part of his ULURP recommendation on the Downtown Brooklyn Plan, the Borough President called for the implementation of a pilot Downtown Brooklyn Resident Parking Permit Program. The Downtown Brooklyn Council recently conducted a Downtown Brooklyn Residential Permit Parking Study to assess the need and viability for permit parking in Fort Greene, Boerum Hill, and Brooklyn Heights. It determined that the number of autos owned by residents exceeded the number of available on-street parking spaces. It also found that the demand for parking by residents was overwhelmed by vehicles from outside the area. Although there was a great range of auto ownership in the communities studied, the study recommended implementation of a pilot to provide residents an equal, if not better opportunity to use local on-street parking spaces.

The Borough President urges the City of New York to move forward with that recommendation to establish the Downtown Brooklyn Resident Parking Permit Program and to extend the catchment area to include Prospect Heights. Residents will be sacrificing a significant amount of parking opportunities in return for the benefits that will enhance all of Brooklyn. These residents should be given their due respect for their inconvenience.

Subway and Long Island Rail Road Improvements

The proposed project’s site is located at one of the most transit accessible hubs in New York City. High density development at transit hubs is a hallmark of sustainable development. Given that the New York City population in 2025 is projected to reach 9.4 million persons, it is possible for this project to serve as a model for sustainable growth in the future. A sound urban planning solution requires that that we consider every transit option.

The DEIS states that given the distribution of transit trips attracted to this site, subway line capacity, platform capacity and stair capacity will not be a constraint in most cases.

However, due to concerns regarding travel to and from the arena, the DEIS recommends increasing 4 and 5 train service, particularly during post event periods. The DEIS states that “crowding on the platforms at the Pacific Street subway station complex could occur during certain post–game situations. Such crowding would be a significant adverse impact, which could be addressed by providing additional subway trains during post-game periods.”

The issue of crowding on the platforms is dependent not only on the difference in the rate at which pedestrians arrive on the platforms and the rate at which they depart on trains, but also on surges, which are difficult to anticipate. Further, the perception by the user of crowding on all the links used in transit travel will determine their perception of the attractiveness of transit travel, and therefore the success of the project’s efforts to reduce auto use and maximize transit use.

Given riders' concerns about overcrowding, the Borough President suggests that use of the NYC Transit Authority's loading guidelines may not be the best measure of successfully attracting additional riders and diverting them from auto use and reducing street congestion. The FEIS should evaluate a comfortable level of service for all subway lines through Downtown Brooklyn since encouraging travel via public transit to and from the arena site and thereby reducing auto usage, is one of the overarching goals of the project.

Use of public transit has an indirect effect on auto use, and a direct effect on pedestrian use of sidewalks and crosswalks near station exit/entry points and intersections. Accordingly, to minimize the impact of passengers exiting the subway on the sidewalks and crosswalks near the project development site, the project provides direct new underground access to the "Urban Room" from the Atlantic Avenue/Pacific Street station complex.

Many community residents and civic leaders have called for the development of an underground pedestrian network to serve the Atlantic Yards development. Below are two opportunities that warrant consideration and review by the MTA as part of their long-term capital plan to enhance the underground pedestrian connections currently proposed in the DEIS.

As proposed in the Borough President's "Brooklyn Subway Connectivity Improvements" which was included in the Borough President's *Transportation Priorities for Federal Funding*, Downtown Brooklyn subway stations currently without transfer capacity need improved connections to support the anticipated growth. One option is to provide a Hoyt Street Connector to and from the Hoyt Street 2 and 3 station and the Hoyt-Schermerhorn A, C and G station. This passageway is one alternative to provide the missing connection between the two stations in Downtown Brooklyn. It would also provide a means for G train riders to transfer to the 2 and 3 trains for direct access to the "Urban Room." The proposed passageway would connect and widen the Livingston Street entrance of the Hoyt-Schermerhorn station with the Hoyt Street station on Fulton Street, or use the closed corridor to Macy's Department Store.

The FEIS should seek to improve the flow of Long Island Rail Road (LIRR) passengers from Flatbush Terminal through to the Urban Room. Unlike Madison Square Garden which has a direct connection to the commuter railroads, the DEIS proposes that LIRR passengers use street sidewalks and crosswalks to access the project site. The FEIS should examine the creation of a thru-ticketing arrangement for LIRR riders which enables them to pass thru the paid zone for the subway to reach the "Urban Room" without payment of a subway fare. Otherwise, project generated trips via the LIRR would be required to use the existing entrance to LIRR's street level concourse on Flatbush Avenue.

Both of the above improvements would require re-evaluation of "Urban Room" escalators E1 and E2, and appropriate modifications.

With regard to the Long Island Rail Road, the DEIS does not discuss operating improvements for LIRR services between Jamaica and Flatbush Terminal. The FEIS should consider LIRR train frequency.

Over the last 35 years, the MTA has made significant strides in improving access for the elderly and physically-challenged, including making all buses ADA compliant, and developing its *Key Station Plan* to make 100 NYC Transit subway stations ADA compliant by 2020. The Atlantic Avenue/Pacific Street station complex is a Key Station that is currently ADA-compliant. However, wheelchair bound subway riders going to Atlantic Avenue station are advised to be in the 6th car on the 4, 5 trains. Therefore, 2 and 3 train riders are advised to change to the 4, 5 train at the Nevins Street Station. The FEIS should analyze improvements for handicapped elevator access from the platform.

Given the long lead times necessary to construct and implement transit capital projects, and the vital role that transit will play in the success of this project and the area's mobility, it is important to have greater MTA participation in providing the needed transit improvements and expedite their inclusion in the pipeline, and the MTA Capital Program.

Bus and Commuter Van Improvements

The movement and mobility of persons through this corridor between Grand Army Plaza and Livingston Street should be expedited consistent with the strategic role of Flatbush Avenue. Any traffic plans developed to support the Atlantic Yards project should provide for maximum mobility through this corridor. The FEIS should analyze the implementation of a peak hour bus lane, similar to that on Livingston Street. Accordingly, the Bus Rapid Transit (BRT) study consideration of corridor improvements in this section of Flatbush Avenue should be accelerated.

Further, lawful prohibitions on the operation of commuter vans along bus routes, such as Flatbush Avenue, should be strictly enforced to reduce congestion along this critical corridor. To the extent that "much of the pick-up and drop off activity continues to occur at non-designated locations," as stated in the DEIS, the challenge for NYCDOT and the TLC is to exercise effective oversight of this industry, including legal vans, which complement the subway and bus systems, and the proliferation of illegal vans, which undermine public control of the streets.

The proposed project will generate considerable pedestrian traffic, either directly or indirectly as a result of increased transit utilization. The "Urban Room" and the direct access to the project site it provides from the Atlantic Avenue and Pacific Street station complex is a good example of planning to ameliorate the effect of the project on pedestrian movement.

The DEIS states that the increasing pedestrian and traffic volumes at certain locations "may increase the potential for vehicle-vehicle and vehicle-pedestrian conflicts or accidents." Correspondingly, the DEIS proposes several roadway changes, the

installation of high visibility crosswalks and lighting, new off-street bike route segments, and the expected deployment of police or traffic control officers to enhance overall safety.

Bicycle and Pedestrian Improvements

With regard to bicycle lane improvements, the DEIS proposes to link off-site bicycle lanes through the project site and take advantage of a network of bicycle lanes developed by the NYCDCP and NYCDOT in the City's Bicycle Master Plan. This plan has significant implications for Downtown Brooklyn, as can be found in the Downtown Brooklyn Transportation Improvements referenced above. More bike lanes and other street improvements that make biking and walking safer and easier will encourage cycling and walking, while reducing car traffic and air and noise pollution.

To that end, the Borough President supports NYCDOT's planned bike lanes on Cumberland Street, Carlton Avenue, and Willoughby Street, which will make good connections with the existing bike lanes in Prospect Heights and Fort Greene, and create a real network that helps make cycling a practical choice and incentive for transportation in Prospect Heights, Fort Greene, Clinton Hill, and Bedford Stuyvesant.

Like the Dean Street and Bergen Street bike lanes in Prospect Heights, and the DeKalb Avenue and Myrtle Avenue bike lanes in Fort Greene, the new bike lanes on Cumberland, Carlton and Willoughby will narrow travel lanes to create a dedicated bike lane. The narrowing will calm traffic, slowing drivers and making them more aware of cyclists.

To enhance public safety, the Borough President further recommends the FEIS include a pedestrian/traffic safety study, consistent with any applicable CEQRA/SEQRA thresholds for each intersection that has an increase in pedestrian and bicycle volumes attributable to this project, including those not currently disclosed.

Transportation Planning and Coordination

As conditions before the 2010 and 2016 build years evolve, before and after studies should be conducted to verify projected conditions. An on-going traffic monitoring plan should be implemented so that changes in traffic volumes can be identified and their affect on the area's traffic projections analyzed, and plans modified, if necessary. Complementing the monitoring plan, the simulation of traffic behavior on the area's street network is necessary to serve as a tool for managing it on an on-going basis. The NYC DOT should develop an area-wide computerized traffic simulation model that is linked to the Best Practice Model (BPM) managed by the New York Metropolitan Transportation Council (NYMTC). It would be used to confirm the effectiveness of all the above and establish a comprehensive traffic simulation of all changes in land use and the street network in greater Downtown Brooklyn.

Market testing of demand management techniques need to continue to obtain greater confidence in the assumptions and the effectiveness of the options, and to assist in the refinement of measure after the FEIS is completed.

Other transportation/traffic mitigation measures the FEIS should consider using traffic agents and implementing a trolley loop system connecting all mass transit. Traffic agents should be used during all games and major events at the arena to ensure traffic moves smoothly. A trolley loop can more effectively connect the transit locations in downtown Brooklyn encouraging more mass transit use and decreasing car use.

TASK 14. AIR QUALITY

Although it might not be within the target scope of analysis, the FEIS should monitor other locations that might be affected by this project. The FEIS should examine areas such as Lafayette Avenue and Fulton Street or the Brooklyn Bears Garden. Other intersections include Washington Avenue and Fulton Streets and where Lafayette Street transverses St. Felix Street, Carlton Street and Vanderbilt Avenue. It would be useful to note whether the addition of these locations will prove to cause a significant adverse impact to the area. The FEIS should also consider the impacts on air quality during the construction period. Every precaution should be taken during the construction period to alleviate any air pollution.

TASK 15. NOISE

Although the DEIS acknowledges that other noise sources will not be significant, the analysis of noise pollution could have been strengthened by expanding this scope. Vehicular traffic will only be one component of noise as arena-goers will use all possible routes and modes to reach that destination. Street traffic can become an issue as the arena will create huge crowds of people congregating to the area. Also, the construction period will create noise pollution which will impact the neighboring residents and pedestrians. Therefore, every precaution should be taken to alleviate any noise pollution that may be harmful to neighboring residents and pedestrians. By incorporating an analysis model which can factor in pedestrian travel, the FEIS will be able to cover more sources of noise than just vehicular.

It has also been noted through statements by the community that a broadening of the analysis parameters should also be considered. For example, the Council for Brooklyn Neighborhoods has outlined a number of additional 'noise-sensitive' areas to accompany the 12 locations used in the DEIS. It is believed that by gathering more noise level data, a truer conclusion can be drawn.

TASK 16. NEIGHBORHOOD CHARACTER

The DEIS fails to address the transition at the project boundaries with Boerum Hill, Park Slope, the Atlantic Village homes fronting Atlantic Avenue and Prospect Heights along Dean Street at 6th Avenue and Pacific Street opposite Newswalk. Such transition extends along brownstone lined streets such as Pacific Street westward into Boerum Hill and along Sixth Avenue into Park Slope; and the Fourth Avenue corridor joining Boerum Hill with Park Slope where recent zoning map changes set the stage for development up to 120 feet in height that over time will transform Fourth Avenue into “Brooklyn Boulevard.” The FEIS should address these concerns.

The DEIS fails to acknowledge that project generated traffic will also result in adverse neighborhood character impacts for the existing residential buildings along Pacific Street opposite Site 5.

The DEIS does not acknowledge the change in character along edges of the project including Atlantic Avenue between South Oxford Street and Carlton Avenue; Pacific Street between Flatbush Avenue and Carlton Avenue; and, opposite Site 5 along Fourth Avenue and along Pacific Street.

More specifically, the Borough President finds the following DEIS assertions questionable: the compatibility of the proposed Site 5 building massing with existing buildings along Fourth Avenue and the transition block of Pacific Street between Third and Fourth Avenues; the compatibility of Site 5 building with the recently established R8A district along Fourth Avenue and the compatibility of building 6 with the Atlantic Village townhouse across Atlantic Avenue.

The FEIS should include an evaluation of the height of Building 3 as the building is highly visible along Sixth Avenue and Dean Street.

TASK 17. CONSTRUCTION IMPACTS

Although the DEIS states that there would be no significant adverse impacts to the local businesses surrounding the project area, further analysis is necessary as sidewalk closures, changed bus routes and lessened pedestrian traffic during the 10-year duration of the construction period will have detrimental effects to the local businesses in the project area.

Since the DEIS has acknowledged that significant adverse impacts on traffic will be exacerbated by construction vehicles and lane closures during the construction period, the FEIS should consider the feasibility of delivering construction materials and removing construction debris by use of the Long Island Railroad (LIRR) as a possible mitigation method.

The FEIS should acknowledge that the measure intended to mitigate noise and air quality problems during construction – providing double-paned windows and air conditioners for

residents and community facilities – is not a solution for these problems, only a way to mask them while residents are inside their homes. The FEIS should recommend further mitigation methods so that these impacts are lessened in outdoor spaces.

Forest City Ratner should also stop construction on all recognized religious holidays in respect of the multicultural communities in Brooklyn.