



**Statement by Brian Ketcham, P.E.,
Executive Director, Community Consulting Services
Brooklyn Borough Board, December 5, 2005
Atlantic Yards Draft Environmental Impact Statement (DEIS)**

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The Borough President has asked me what you should look for in the Atlantic Yards DEIS. The challenge is whether this document makes a convincing case that we can add another 9 million square feet at Atlantic Yards on top of the 30 million square feet of development that has already been approved or is underway in and around Downtown Brooklyn. Can we plunk this mega-project on the already congested linchpin of our transit and roadway network without strangling redevelopment across Brooklyn?

First, does the study area encompass the chokepoints through which Atlantic Yards traffic will surely pass—like the already choked Brooklyn Bridge, the Prospect Expressway and the BQE? The draft scope excludes them. That's why the three directly affected community boards, 2, 6 and 8, have asked that the study area cover their entire districts. Let's see if the DEIS responds.

Second, don't be snowed by 65 intersections proposed for analysis. The number is meaningless if the DEIS, even though it is being prepared under State SEQR rules, analyzes traffic, as the draft scope said it will, with the City CEQR procedure. This is a simplistic, archaic method that conceals impacts. These paper calculations of each isolated intersection are incapable of analyzing how traffic at one intersection affects another. So it loads traffic onto jammed intersections without showing any spillback onto others or any spillover onto neighborhood streets—the very problems that plague the project area. All you get to see in most EISs are long lists of intersection “Levels of Service.”

That's why the Borough President has said this DEIS must analyze traffic with a simulation model that depicts the way traffic actually operates across a roadway network. In your handout is a screenshot of a portion of a network model that we began to prepare. This is the standard tool on State roadway projects. Anyone familiar with the area can confirm or reject the visual simulation of traffic conditions. Without a network model, they're faking it.

Third, does the future baseline account for **all** development approved before Atlantic Yards? The DEIS proposes to portray conditions without the project in 2009, when the Nets Arena is scheduled to operate, and 2016 when the largest part of the project will be fully built. But those 17 buildings will be churning out trips for years afterward, when the rest of the 30 million square feet of approved development will also be built. The map in the handout shows the major planned projects as they could be identified last spring. It includes all the rezoned Downtown Brooklyn sites, not just the half that was assessed in the rezoning EIS because of an arbitrary 10-year horizon. 20 years is the normal planning horizon and 30 years is what the State uses to examine road and transit projects.

The DEIS must assume the build out of all authorized development. It will double the number of vehicle and transit trips in and around Downtown Brooklyn. A complete forecast of travel demand is especially important for assessing transit needs and opportunities.

Fourth, does the DEIS heed the Borough President's recommendation that the number and type of trips each project generates be based on counts at residential and office buildings near transit in Brooklyn? Or are they still based on 30 year old surveys in Manhattan?

Fifth, is there full documentation of assumptions and full reporting of all computations? Or does it follow the City CEQR practice of stripping out key data, handicapping reviewers?

Sixth, does the DEIS fall back on the City method of defining impacts as only the increment of the project over future conditions without the project?. Does it then limit mitigation to just a rollback to the future baseline, which remains clearly unacceptable? Or does the DEIS use a network model to optimize traffic flow?

Seventh, is the MTA, which is directly involved in this project, providing their transit demand model to identify impacts on train crowding and where service expansion is needed?

Eighth, does the DEIS commit to field testing the actual effectiveness of installed mitigation and, if necessary, to augmenting it?

In the end, does the DEIS enable us to face the truth: we can't double vehicle trips without new roadway capacity. The capacity is there—it's a matter of how we use it. Do we prohibit all on-street parking? That would give us two more lanes on most roads—other cities do it. Or do we free up the space that is being used by half of the cars and trucks on Downtown Brooklyn roads that are going out of their way to use our free bridges?

These are the tough questions the Atlantic Yards DEIS must address to insure it enhances development across Brooklyn and does not destroy the neighborhoods we love.