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**Response Statement to the
Draft Scope of Work for Preparation of an Environmental Impact Statement
80 Flatbush Avenue
SEQR/CEQR No. 17ECF001K**

Ms. Maldonado:

I am focusing my comments on the size of the proposed area of study, at a mere 400-foot radius. The notion that a study of impacts by a building of this scale could be limited to such a tiny area is insulting to area residents of both neighborhoods. Impacts are felt as an aggregate, and to pretend that this gigantic building sits on a little island of its own most resembles the kind of architectural renderings and models that are often shown surrounded by blank white little rectangles or boxes, as if not really there.

The area of scope for study must be extended to a mile to take in the larger neighborhood of Fort Greene, where I reside, to include the entire Flatbush extension, where hundreds of new residential units have already arrived, with more in the pipeline.

Traffic/roadway impacts

The Fort Greene neighborhood has a figurative wall on the south side created by impinged roadways created by the Pacific Park development, which has limited egress in and out of the neighborhood by car and bus. Flatbush and Fourth Avenues are the most direct vehicle routes to travel inter-neighborhood within Brooklyn going south, and traffic changes on Third Avenue have affected egress in and out of the neighborhood, adding congestion to what once were quiet residential side streets in neighborhoods on either side of Flatbush. To go east or west on Atlantic there are limited left turns, and Atlantic Avenue itself has been narrowed by construction and lane closures due to the arena and further development at the site.

The 400-foot radius must be increased to a mile, to take in incoming Manhattan Bridge, BQE and Atlantic Avenue traffic, at the very least. To pretend that increased garage storage for vehicles will take care of the problem is to ignore the reality that most people traveling into and out of Brooklyn or within it will be driving through the intersection where this proposed development is sited, as will buses and taxis.

Pedestrian egress

DOT tends to address pedestrian safety on an intersection-by-intersection basis with bumpouts and plazas as a one size fits all approach. However, the reality is that our streets are shared among pedestrians, vehicles and bicycles, and some overview of foot traffic patterns in the larger scoping of the area must be included. Only so much can be squeezed into a finite space, and narrowing streets with bumpouts, plazas and bike lanes further congests vehicles, including buses, Access-a-ride and necessary delivery trucks. How will school buses for the elementary school pick up and arrive? How do residents of neighborhoods on both sides of Flatbush tend to travel back and forth, and how will increased foot traffic be accommodated without exacerbating the bottlenecks already occurring at this major intersection?

Public Transportation

Subway stations are all beyond the 400' radius currently proposed, including the A, C, G lines at nearby stops, B, D, R and Q lines at DeKalb and the multiple lines running through the Atlantic-Pacific hub. Students attending these proposed schools and residents of the proposed building do not disappear when they step off the "island" defined by the current 400-foot radius currently defined.

Infrastructure such as sewers and electric grid

Already overtaxed by other huge new developments along Flatbush due to the upzoning (originally designed as office space but now residential and commercial), and other new developments in the pipeline, the antiquated sewer system is inadequate, whether the sewer pipes directly serving such a huge new building are enlarged and/or replaced. The watershed that sends combined rainwater and sewage to Gowanus or Sunset Park or that gets pumped back up to the Red Hook Treatment Plant near me in the Navy Yard are already unable to handle the current volume. Streets north of me, above Park Avenue, regularly flood in heavy rains from overfilled sewer street drainage, a block from the Red Hook treatment plant. To pretend that additional thousands of gallons a day won't be a problem by ignoring impacts beyond 400 feet from this building is ridiculous.

My block recently had an 18-hour power outage during a heat wave when a manhole caught fire. The Con Ed supervisor told me bluntly that the highrise and other new multiple dwellings added to my block were just more than the old electric cable could handle. We on the block are still being served by an above-ground "stent", in Con Ed parlance, because the utility cannot splice it permanently to other lines on the avenues at the opposite ends of the block. What are the plans to look at Con Ed infrastructure beyond a 400-foot radius area of this proposed development to understand which blocks are connected to the existing lines for this development site?

Summary

Impacts from development of this size cannot be viewed in a vacuum, as if other major development around it does not exist. Major new developments along the Flatbush extension and in downtown Brooklyn and at Pacific Park are part of a larger aggregate of impacts. Providing a school or two in a questionable location in terms of the issues of transportation and pedestrian safety should not be seen as sufficient to outweigh larger impacts that end up being mitigated on the public dime.

Finally, though this comment may be off-topic in some ways, as a taxpaying citizen, I am outraged that public policy is so non-existent that the carrot of upgraded schools or new schools becomes hostage to private development profits. My children went to public schools in New York City, and if there were building upgrades or new school seats needed, this was a matter of public debate and political pressure. What the City will lose to tax credits to this developer could or should pay for improvements to the existing high school. Our children deserve to be considered as priorities in City budgeting, not as pretexts to justify bonuses to a private developer. Shame on the School Authority and the Mayor and City Council, for not adequately allocating funding for our children in the annual budgets! These schools should not be an excuse for private profit for development that only exacerbates lacks in our infrastructure and truly underscores the lack of true overall planning for our city.

Yours truly,
Enid Braun
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Submitted via email