

FROM:

Lucy Koteen  
138 Lafayette Ave  
Brooklyn, NY 11238  
718-643-9219

TO:

JENNIFER MALDONADO, EXECUTIVE DIRECTOR  
NEW YORK CITY EDUCATIONAL CONSTRUCTION FUND  
30-30 Thomson Avenue, Fourth Floor  
Long Island City, NY 11101  
KhalilGibran80Flatbush@schools.nyc.gov

July, 2017

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

**The scoping process is intended to focus the DEIS on those issues that are most pertinent to the proposed action. Due to the scale of the proposed buildings, there is no category that is not pertinent to the proposed development.**

1. The area of study proposed of a 400 foot radius is completely inadequate. Since the 2004 rezoning the area has been saturated with increased population with many new high end high rises that will continue to increase in the next 10 years with buildings under construction and permitted for construction to begin in the next few years. It is imperative that the study area must include the area from the Brooklyn Bridge Park through Downtown Brooklyn, Boerum Hill, Fort Greene, Clinton Hill, Prospect Heights and the Gowanus area. Anything less will not include the full impact on all aspects of infrastructure. This includes evaluating electrical capacity, gas line capacity, sewage system, transportation system, traffic congestion, school capacity. This would be roughly a mile radius to take in the new construction at LICH, Brooklyn Bridge Park, Pacific Park and the many other new high rises within that mile. All of these new high rises will impact the area infrastructure. To study only 400 feet would be to segregate this project from all the many other developments. Further it must include not only current buildings that are up, many of which are not yet occupied but it must project at least the projects in process or permitted and their populations to the expected completion date of the project. If there is a desire for transparency, anything less would be a deception of actual impact. Four Hundred feet does not even include Atlantic Terminal or One Hanson Place the most significant Landmark in the area or Pacific Park with over 5000 units to be built out around 2025.

As written recently in an article from the Real Deal, we are all aware that there is a glut of high end units in the area. <https://therealdeal.com/2016/08/30/will-fort-greens-glut-of-rentals-put-an-end-to-rising-prices/> Therefore, the EIS must include a thorough analysis of market feasibility that all units at 80 Flatbush Avenue will be rented or bought after completion. It is insufficient for the developer to state a *belief* that the market will catch up to the demand by the time of completion. There must be a scientific study to show that the market is not saturated for many years to come.

The Downtown Brooklyn Partnership has an interactive map that includes most of the current new structures and the potential structures to be built in the near future. All of these must be included in population assessments and infrastructure impacts.

[https://www.google.com/maps/d/viewer?mid=1Q73lmJ5UjxHsA8hfdvQilnewORs&hl=en\\_US&ll=40.692105444335034%2C-73.987615&z=15](https://www.google.com/maps/d/viewer?mid=1Q73lmJ5UjxHsA8hfdvQilnewORs&hl=en_US&ll=40.692105444335034%2C-73.987615&z=15)

Here is a list of many, but not all, of the new and projected developments:

250 Ashland	51-stories, 585 units
300 Ashland	32-stories, 379 units
300 Livingston	25-stories, 714 units
299 Livingston	17-stories, 37 units
210 Livingston	26-stories, 349 units
117 Livingston	21-stories, 110 units
333 Schermerhorn	44-stories, 581 units
319 Schermerhorn	21-stories, 74 units
10 Nevins	33-stories, 150 units
237 Duffield	21-stories, 105 units
138 Willoughby	59-stories, 450 condos
141 Willoughby	44-stories, 270 units
86 Fleet Place	32-stories, 440 units
1 Flatbush	19-stories, 183 units
66 Rockwell	42-stories, 327 units
Avalon Willoughby	57-stories, 823 units
436 Albee Square	28-stories, 150 units
24 Fourth Ave	12-stories, 72-unit condo
550 Vanderbilt	18-stories, 275 units
461 Dean Street	32-stories, 363 units
664 Pacific	26-stories, 300 units
535 Carlton Ave	18-stories, 298 units
38 Sixth Avenue	23-stories, 305 units
615 Dean Street	26-stories, 245 units
Others to come:	
Pacific Park	buildings to come with a total of over 5000 units
10 City Point	
Phase II	19 and 31 stories
9 Dekalb*	73-stories +spire, 495 units, 1066 feet (next to Junior's; 20% comm)
11 Hoyt St	(Macy's parking lot with possible tall tower)
PC Richards/ Modell's site	1.1 million square feet of office space
Some others:	
280 Ashland Place	12 stories, 123 units
New commercial building on Fulton between Ashland and St. Felix-about 20 stories	
The Hendricks, 509 Pacific Street	
Forte, 230 Ashland Place 180 condos	
80 DeKalb Ave	34 story, 369 units
The Toren, 150 Myrtle Av, 38 stories, 240 units	
306 Gold Street	40 stories, 302 units
277 Gold Street	13 stories, 133 units
415 Red Hook Lane -21 Stories, 108 Units	

2, Transportation impact can not be assessed without including all new construction within a mile radius. The project promoters speak of being near the large transportation hub at Atlantic Terminal which already experiences significant crowding. It will become significantly worse when Pacific Park and other construction projects are completed. Impacts are felt not just at the closest entry point but all down the line which is why all new and projected construction within at least a mile must be included in the study area to assess transportation impact. The same is true for bus impact, pedestrians on the street, increased number of cars and bicycles. Included in transportation study must be the 1.1 million square feet of office space proposed by forest city Ratner at the P.C. Richards and Sons and Modell's Sporting Goods locations. This would have an enormous impact on the people using the subway and pedestrian subway at a very crowded intersection.

3. Projected school population increase for the next 10 years must be studied. One rationale for this project is that it will help alleviate the overcrowding of the schools. Using the DOE calculations it has been shown that in fact the many units of just the two new high rises proposed at 80 Flatbush Avenue, will increase the shortage of school seats, not alleviate the shortage. Accurate DOE calculations must be shown. Again this is why a study must include the population from all units new to district 13 and 15. The project would negatively affect the available classroom seats for primary school students because the plan to build a school facility for 350 primary school students falls well short of the minimally projected 507 students who would likely be added by the occupancy of the residential towers. So the new primary school would be filled from within still leaving a surplus of resident children without school seats.

4. The current condition of the Khalil Gibran school must be studied. It is the responsibility of the DOE to maintain public schools in a modern standard condition that creates a good learning environment for its students. A factual evaluation of the school's needs must be presented to the public. Since the school will continue to operate during the years of demolition and construction a full model of how the students will be protected from noise, dust, and toxic dust must be analysed.

5. Shadow studies on a 12 month basis must be included in studies.

6. Glare from the buildings must be included in studies.

7. Wind tunnels created from the buildings must be included in studies.

8. Tax evaluation. A side by side analysis must be studied and shown to the public between the as-of-right taxes contributed to the city general funds and all the tax benefits that will be available to the developer and not contributed to the general funds of New York City and New York State. This means there must be a comparison studied of the benefits for the developer vs costs to the public. The developer will only be building a shell of one school leaving the build-out of the school and on going expenses including teacher salaries, supplies and all the other needs of a school to the DOE. The rebuilding of the Khalil Gibran School must be compared to what it would cost for the DOE or SCA to outfit the school to the degree that it is a fully functioning school. Further the taxes of all other residents will by necessity have to be raised to cover the cost of the increased need to improve all utilities, increase police, fire, sanitation personnel since there will be so many tax deductions taken by the developer so the rest of the community will have to carry them. This is a subsidy given to the developer that must be included in the studies.

9. An explanation as to why the SCA is not providing a new school as it is the understanding of this community that they have \$200 million to spend in this school district to build a school without resorting to using a private developer who will greatly benefit with tax deductions and out of scale height by incorporating the shell of a school. The community demands full transparency from the DOE, the SCA and the ECF.

10. Sewer conditions, effect on waste facilities. Sewer facilities are already over burdened and because of combined-sewer overflow, many people in Boerum Hill and the Gowanus area already experience flooding in their basement of backed up sewer water.

11. Character of neighborhood. Please note that the project area is located in Boerum Hill, not Downtown Brooklyn as is falsely stated on the 80 Flatbush website. The area is composed of 3,4, and 5 story town houses, roughly 170 years old by time of completion. The two towers are wildly out of scale with the neighborhood.

12. Vibrations from construction jack hammers and large trucks would very likely damage existing historic houses. Thorough vibration studies must be undertaken.

13. A right to a peaceful neighborhood must be considered. Residents who have invested large sums of time and money into preserving their historic houses must be considered and their right to a peaceful environment that they bought into. The residents will be under a many-year assault of noise, delivery trucks, traffic, dust, large construction vehicles, many construction workers occupying their streets and stoops. These conditions must be forecasted to 2025.

14. Effects on the streets. There has been considerable reconfiguring of the surrounding streets over the last few years. Access into and out of Fort Greene has been greatly reduced by road closures such as the discontinuation of 4th Avenue to Hanson Place. The drawings show the removal of the Schemerhorn slip. Most of the cars that come along Schemerhorn continue onto the slip to access Flatbush Avenue. Removing the slip and throwing all the cars from Third Avenue and Schemerhorn onto the short leg of Third Avenue will create chaos at the intersection as cars attempt to turn right onto Flatbush, go straight onto Lafayette Av, or turn left onto Flatbush Ave. As it is now traffic is backed up down Third Ave and down Lafayette Ave. to Classon Ave because of street changes. There are plans from DOT now to make many more changes on Flatbush Avenue that will effect the whole area. All traffic patterns along Flatbush Av, Third Av, State Street, and Schemerhorn need to be studied as there will be severe impacts from the many years of construction and the large increase in population.

15. The community expects full transparency in all matters of this project. The ECF started out very badly by allowing only 6 or 7 business days to submit comments. The scoping meeting was held just before the 4th of July weekend and the day before the last day of school as parents and families were preparing for vacation or getting children ready for camp programs. The standard time for response to scoping hearings is 30 days. This gives the appearance that the ECF deliberately set the comment period to come at the most inconvenient time for families. This gives a very bad impression of the ECF and their desire to work with the community.