



Prospect Heights
Neighborhood
Development Council

284 Park Place
Brooklyn, NY 11238

646.847.9720
www.phndc.org

November 22, 2017

Hon. Bill de Blasio
Mayor
The City of New York
City Hall
New York, NY 10007

Re: Proposed development at 80 Flatbush Avenue by Educational Construction Fund and 80 Flatbush LLC

Dear Mayor de Blasio:

We write with respect to the above-referenced project to share our concern regarding the plans which so far have been released. Although the project is not within the Prospect Heights neighborhood, it is in close proximity and has potential to influence development along the Flatbush Avenue corridor south of its site in a way that could affect the neighborhoods of Prospect Heights, Park Slope and Boerum Hill.

Specifically, the proposal to allow density of 18 FAR at the site is unprecedented for a location abutting an R6B zone containing row houses. The current zoning allows for 6 FAR, providing a transition between the new high rise buildings at 113 Flatbush (overbuilt at 7.32 FAR versus an allowable maximum of 6 FAR) and 350 Livingston Street (overbuilt at 12.57 FAR versus an allowable maximum of 10 FAR), and the row houses south and west along State Street (maximum 2 FAR). Tripling the current FAR next to a low-rise residential neighborhood is not only poor urban design, it would create a dangerous precedent in a part of Brooklyn experiencing tremendous development pressure.

Should 80 Flatbush proceed as proposed, for example, it would be very likely to be cited as precedent by Atlantic Yards developers Greenland Forest City Partners to justify their expected application to shift density previously planned for the southeast corner of Atlantic Avenue and Flatbush Avenue (i.e., in front of the Barclays Center arena) across the street to a location known as Site 5 (currently occupied by Modell's and P.C. Richard). Like block 174 where 80 Flatbush would be constructed, the Site 5 block also abuts an R6B zone to the south and west.

Our concern here is not simply one of urban design and aesthetics. The experience of neighbors living next to the Atlantic Yards project over the last seven and a half years has not demonstrated that dense, out-of-scale new development is compatible with historic, low-rise residential blocks. We have instead seen protracted construction create significant environmental impacts to these residents, and operations of new uses change the character of the neighborhood.

We understand the argument that public/private partnerships should be part of the solution to the City's need for public goods like affordable housing and school facilities. However, large multiphase redevelopment projects that require access to considerable capital and carry substantial exposure to market risks have not always proven to be prudent choices to deliver public benefits in the near term. Again, the Atlantic Yards project serves as a case in point. On balance, since Atlantic Yards' approval in 2006, we have not been convinced that the opportunity for public benefit from unconstrained redevelopment justifies the risk to existing Brooklyn communities, nor have we found government's negotiation of such arrangements to be equitable for public stakeholders.

We therefore call upon you to affirm the City's commitment to transitional zoning in northwest Brooklyn in a way that preserves and protects existing low-rise

neighborhoods, while also allowing for sensible new development. We further ask that a formal policy in this regard be presented for public comment before 80 Flatbush moves further in the approval process.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Witherwax". The signature is written in a cursive, flowing style.

Rob Witherwax
Chair

cc: Public Advocate Letitia James
Brooklyn Borough President Eric Adams
State Senator Velmanette Montgomery
State Senator Jesse Hamilton
Assembly Member Jo Anne Simon
Assembly Member Walter Mosley
City Council Member Stephen Levin
City Council Member Laurie Cumbo
Brooklyn Community Board 2 Chair Shirley McCrae
Brooklyn Community Board 8 Chair Nizjoni Granville