

From: Norman Ryan <norman.ryan@eamdc.com>

Date: Mon, Jul 10, 2017 at 8:58 AM

Subject: from NORMAN RYAN Re: 80 Flatbush Ave LLC

To: khalilgibran80flatbush@schools.nyc.gov

Cc: ojonas@nysenate.gov, Norman Ryan <ndryan@gmail.com>

Dear Jennifer Maldonado:

I am writing to submit comments on the NYC Educational Construction Fund and Alloy Development's proposed 80 Flatbush Ave LLC "Draft Scope of Work," as presented to the public for the first time at a scoping meeting held on June 28, 2017 at the offices of the NYC Board of Education. My specific questions and concerns regarding the 80 Flatbush Ave project as currently proposed are summarized in the bulleted list below, followed by detailed comments on each point.

- STUDY AREA

Why is the Environmental Impact Study limited to a 400 foot boundary around the proposed development site? Given the proposed size of the towers and overall scope of work proposed, this study area is inadequate and should be expanded to at least one-half mile.

- SHADOWS, REFLECTIVE LIGHT GLARE & WIND

In addition to an environmental impact analysis of shadows cast by the proposed towers, why is there no concomitant analysis included in the EIS for reflective light glare cast by the skin of the towers and wind related impacts resulting from tower massing?

- DENSITY

How will the ECF and Alloy Development address the impact the new buildings will have on street traffic and transit overcrowding during the proposed development's construction phase and when the buildings are fully operational? How does the ECF and Alloy Development square the addition of a 350 seat primary school with the actual number of school age children that will result from the addition of over 900 units of housing in CSD 15, a district that is already lacking in sufficient school seating and operating at 122% capacity? There are sound reasons why the zoning of Block 174 is designated C6-2. An as-of-right mixed-use building that complies with the current C6-2 zoning regulations makes sense for a site that anchors an historic Boerum Hill brownstone neighborhood with the landmarked BAM Cultural District.

- NEIGHBORHOOD RESPECT

The 1977 Landmark designation for The Williamsburgh Savings Bank, which is located within the current Environmental Impact Study area, emphasizes its place on the skyline: "The setback, the most striking feature of the building, enhances its soaring height and gives distinction to its silhouette." How will Alloy Development and the Design Architect address the preservation of view corridors to the

landmarked silhouette of the Williamsburgh Savings Bank clock tower from multiple Brooklyn neighborhoods?

- SAFETY

How will the ECF and Alloy Development address pedestrian and school safety issues at a crossroads that has been noted in past environmental impact studies to be one of the most congested and dangerous in New York City?

#### STUDY AREA

Given the proposed size of the two towers and overall scope of work proposed, the 400 foot boundary study area is inadequate and should be expanded to at least one-half mile. Unless the size and scope of work is significantly reduced and the project site is developed with an as-of-right mixed use building adhering to current zoning regulations, it is imperative that the environmental impact study area be expanded. The buildings as currently proposed will impact a large area of Boerum Hill and Fort Greene in terms of shadows, air quality and circulation, reflective light glare, construction noise, increased pedestrian and vehicular traffic, transit overcrowding, indirect residential displacement, and increased strain on street parking and water and sewer infrastructure. How will the ECF and Alloy Development address the significant environmental impacts such a massive development will have in our neighborhood, on our streets, and on our infrastructure well beyond the currently proposed 400 foot study area boundary?

#### SHADOWS, REFLECTIVE LIGHT GLARE & WIND

80 Flatbush Ave is located in Boerum Hill on the border of Fort Greene, an area that has seen the rise of several new buildings in recent years, however none that compare in size and overall build-out of 80 Flatbush Ave as it is currently proposed. As a resident of Fort Greene, I and many of my neighbors in both Fort Greene and Boerum Hill currently experience reflective light glare from buildings including 250 and 300 Ashland Place in addition to aggravated wind effects resulting from new construction that is significantly smaller in overall massing than the proposed massing of the 80 Flatbush Ave towers. What is the ECF and Alloy Development doing to eliminate reflective light glare and ameliorate wind related impacts resulting from tower massing as currently proposed?

#### DENSITY

The addition of a 350 seat primary school to the 80 Flatbush Ave project is sorely inadequate when compared to the bloated size of Alloy Development's proposed residential component of the new mixed-use development. The addition of a 350 seat primary school will have little impact when one considers the actual number of school age children that will result from the construction of over 900 units of housing. Most unfortunately, it appears that the much needed overhaul of the Khalil Gibran High School and the addition of a minuscule primary school and community/cultural space are being used by Alloy as glib cover for a pass at oversized, non-contextualized development. There are sound reasons why the zoning of Block 174 is designated C6-2. An as-of-right mixed-use building that complies with the current zoning regulations makes sense for a site that anchors an historic Boerum Hill brownstone neighborhood with the landmarked BAM Cultural District.

## NEIGHBORHOOD RESPECT

The 80 Flatbush Ave development site sits squarely inside the Boerum Hill brownstone neighborhood, bordering directly on the four-story historic housing of the 500 State Street block, one of Brooklyn's most distinctive brownstone blocks. This is not a location for downtown Brooklyn scale development. The proposed towers, 986' and 531' tall respectively (taking into account the bulkheads of both buildings), have not been conceived in context with the surrounding neighborhood; instead they flaunt a cavalier lack of architectural respect for the landmarked status of the bordering neighborhoods of Boerum Hill and Fort Greene.

In his report on the 300 Ashland Development, former Brooklyn Borough President Marty Markowitz commended the efforts of the developer (TwoTrees) to "produce a building layout that keeps intact the presence of one of the borough's most iconic structures, the Williamsburgh Savings Bank tower." He spoke of "Iconic Respect", the need for the developer to understand and respect the distinctive character of Brooklyn's historic skyline. He went on to state that "there is merit in wanting to retain the tower as an iconic skyline feature."

80 Flatbush Ave LLC, as the draft scope of work currently stands, ignores "Iconic Respect" entirely, blocking view corridors of the Williamsburgh Savings Bank tower from nearly all neighborhoods lying west and south of the proposed development. I join countless residents of Boerum Hill and Fort Greene in strongly objecting to the tower massing as it is currently proposed and will entreat all officials reviewing Alloy Development's appeal for re-zoning of the site to permit a FAR of 18 to reject their appeal and demand a reduction in tower height and overall massing.

I support development and understand the need for same. However, I also know it is possible to achieve harmony among new development, historic brownstone neighborhoods, and iconic landmarks. It is the right thing to do.

## SAFETY

The 80 Flatbush Ave development site is located at one of the busiest crossroads in New York City. The addition of a loading dock on State Street near a public school entrance and the tower's residential entrance will compromise pedestrian safety. No loading dock should be allowed on State Street. In addition, how will the ECF and Alloy Development address issues of access for Engine Company 226 through State Street and/or Third Avenue to Flatbush Ave during construction and post-construction phases, anticipating construction lane closures and the impact of school buses on these streets in addition to the current traffic load?

I enjoin the ECF and Alloy Development to heed the concerns I have expressed in this letter as well as the concerns of my neighbors. I welcome development when it welcomes us, the residents of Brooklyn. I am a member of the MetroTech BID Board and, as such, have actively supported development that respects the context of existing neighborhoods. I trust that 80 Flatbush Ave wishes to be a good neighbor and will act accordingly to design and construct a new building that complements the distinctive fabric and character of Boerum Hill and Fort Greene. If Alloy Development's plans are allowed to proceed unaltered, we will lose a vital component of what has fueled Brooklyn's renaissance in recent years: its focus on neighborhoods, diversity, and the unique, handmade quality of daily life here that has made Brooklyn a renewed haven for building communities and families.

Respectfully submitted,

Norman Ryan

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