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COMMENTS ON THE DRAFT SCOPE OF WORK FOR AN ENVIRONMENTAL
IMPACT STATEMENT OF THE 80 FLATBUSH AVENUE PROJECT

PROPOSED PROJECT

CULTURAL FACILITY: A number of theaters, arts schools, and event/rehearsal spaces already operate within the cultural district, and the new building at Ashland Place, across the avenue from 80 Flatbush, will include a film library with presentation space.

What use is envisioned for the cultural facility that would be an asset to the current mix, and what changes will be made to the interior of the repurposed building to make it workable?

OFFICE SPACE: A number of new and recent projects in the area include office space (e.g., 41 Flatbush, Albee Square, and Atlantic Yards), on top of what was already constructed in Downtown. How will the space at 80 Flatbush be competitive in this market?

B. PROJECT DESCRIPTION AND PURPOSE & NEED

PROJECT AREA (EXISTING CONDITIONS)

SUBSTANCE ABUSE TREATMENT FACILITY: Where will this facility be relocated?

C. SCOPE OF WORK

TASK 2: LAND USE, ZONING, AND PUBLIC POLICY

The 400-foot area of study is inadequate for a project of this size, especially in a neighborhood that has shown so much recent development. A study based on this limitation will produce inaccurate results, with serious consequences.

In particular, it is a major error to omit almost the entire Atlantic Yards site, in both current and projected form, and the residential and commercial development on Atlantic and Flatbush avenues.

TASK 3: SOCIOECONOMIC CONDITIONS

INDIRECT RESIDENTIAL DISPLACEMENT

As it has done since 1930, the YWCA houses individuals of low and moderate income, probably lower than the average levels determined for this area. For many of these residents, the YWCA is the only remaining housing option in the City that is affordable and would not require a major change of lifestyle.

Our building operates under Agreements with the City. We are uncertain as to the intentions of the management once these Agreements expire. Possibly the 80 Flatbush project will provide additional incentive to, or pressure on, the YWCA and other landlords or homeowners to sell their properties for development or conversion.

Within the past few years, the local laundromat and Walgreen's were both sold to make way for high-end development. These were two successful businesses, on which YWCA residents, and the neighborhood, depended for basic services. It is likely that the retail included in this project will not be affordable for YWCA residents, or relevant to their needs.

TASK 5: OPEN SPACE

Our neighborhood lacks green and outdoor space that is accessible to the public and reliably safe.

New schools should provide protected outdoor recreational space, not just sidewalks on which to congregate. Younger children need actual playgrounds on school premises.

What does your plan provide for either high school or elementary school students?

TASK 6: SHADOWS

Why is there no proposed consideration of the shadows on residential buildings? This element should be measured and steps taken to mitigate its effects.

The YWCA is 11 stories high (142 feet), with extensive footage on both State Street and Third Avenue. It is so close to the taller tower that it is likely to be in shadow during most of the morning hours. Some residents on lower floors, as well as the YWCA's office tenants, could have either no or only indirect sunlight at all times.

As almost all of us live in units with only one modestly sized window, the limited availability of even moderate daylight would be detrimental to our quality of life.

TASK 7: HISTORIC AND CULTURAL RESOURCES

Boerum Hill and parts of Downtown Brooklyn make up a neighborhood of historic significance, whose residents have sought over many decades to preserve its architectural integrity. The project's study radius should be extended to a half-mile to provide full consideration of this characteristic.

I also question the justification for destroying ANY of the historic structures on the project site, including the "insignificant" middle building and the chimney.

ONLY LAST YEAR, in 2016, work was completed that restored and stabilized these structures at a cost in City money of somewhere between \$1.6 million (DOB/BIS job listing) and \$4.5 million (architect's website). Previous efforts over the years to upgrade systems or make other improvements cost several millions more. To now destroy any part of that work is a waste of taxpayer money.

Also, the timing is odd. I can understand why some tasks were necessary and urgent—apparently there were major issues, such as leakage at the foundation—but why was such effort put into restoration and preservation, e.g., removing old exterior paint and repairing the chimney, if KGIA found the buildings so inadequate as an educational facility? Wasn't it already looking to relocate?

A new high school could reasonably be built at this location—or another—to serve this student population. However, the project of which it is a part should not also require the sacrifice of nineteenth-century buildings.

The practice of locating elementary schools and high schools on the same site has been unsuccessful elsewhere, which should make it inappropriate for this project as well. The City should drop consideration of 80 Flatbush as a two-school locale and find another site for the elementary school.

TASK 8: URBAN DESIGN AND VISUAL RESOURCES

This project unquestionably makes "substantial alterations to the streetscape of a neighborhood by noticeably changing the scale of buildings, potentially obstruct[ing] view corridors, or compet[ing] with icons in the skyline" (page 13).

There is absolutely no doubt that 80 Flatbush would have a profound impact on a pedestrian's experience of the neighborhood, and not only on a pedestrian's. Views of the New York City skyline from the YWCA building are now completely blocked by a wall of nearby highrises. This project would contribute to this sense of claustrophobia by blocking sightlines along Flatbush Avenue, in both directions. It would dwarf the

Williamsburgh bank tower, which for almost a century has been a feature of the Brooklyn skyline and of the Ashland/Flatbush triangle.

A tower whose height is 70% of that of the original World Trade Center towers (at 1,362 feet considered oversized even now) is completely out of place in a low-rise neighborhood like Boerum Hill or even Downtown Brooklyn. So is a tower at 531 feet, or about 40%; a building “only” 330 feet tall is still more than twice the height of the YWCA, which for years has been one of the tallest buildings along State Street and even Atlantic Avenue.

The visual and cultural value of the historic buildings on the site would be diminished by surrounding them with enormous structures of radically different character.

TASK 11: TRANSPORTATION

In addition to rush hours, the study should include the time frames in which travel to and from theater, music, and other artistic performances usually occurs—for example, Thursday through Sunday evenings, starting at approximately 7 PM.

At the moment a number of theaters operate within the Cultural District, all of whose audiences contribute to pedestrian and vehicular traffic. For example, the audiences for Roulette Intermedium, which is within the YWCA building, take up the entire sidewalk along Third Avenue at performance times and during intermissions. The people who attend events at the Barclays Center fill the sidewalks and the subway station.

The proposed cultural facility should be included in this study, whether it houses performance space or other art-related activity.

The impact of the operation of the Whole Foods store, planned for the Ashland Place building, could be substantial, with shopping hours from early morning to late at night.

Please note also that the police, department, and EMT services are frequently called to the YWCA. Almost all emergency vehicles park along Third Avenue at the building’s front door.

TASK 17: CONSTRUCTION

The YWCA building is undergoing a façade and roof restoration costing at least \$1.5 million. It was substantially renovated within the past decade at a cost of about \$26 million, all through City grants and loans.

What will be done to protect the building from the effects of construction-related occurrences such as blasting, falling debris, drilling noise, and utility line damage?

COMMENT:

It is a betrayal of the public trust for the City to allow additional construction of market-rate housing, the destruction of historic structures, and the profound alteration of the visual landscape as proposed in this project, in return for such modest additions to the number of school seats and affordable housing units.

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