

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

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This document is the Final Scope of Work (FSOW) for the ECF 80 Flatbush Avenue Draft Environmental Impact Statement (DEIS). This FSOW has been prepared to describe the proposed project, present the proposed framework for the EIS analysis, and discuss the procedures to be followed in the preparation of the DEIS. This FSOW incorporates revisions of the Draft Scope of Work (DSOW) and are indicated by double-underlining new text and striking deleted text.

## **A. INTRODUCTION**

The co-applicants, the New York City Educational Construction Fund (ECF) and 80 Flatbush Avenue, LLC, are seeking a rezoning and other actions to allow the construction of a mixed-use building, a which includes a larger replacement facility for an existing high school, a new primary lower school, and a new residential, office, retail, and cultural community facility space (“the proposed project”). The proposed project is located on Block 174, Lots 1, 9, 13, 18, 23, and 24 in Downtown Brooklyn (see **Figures 1 and 2**). The proposed project would ~~redevelop~~ result in the redevelopment of the site with a 350-seat replacement facility for the Khalil Gibran International Academy, a new 350-seat lower school, up to 922 residential dwelling units (DUs) (approximately 830,000 gross square feet [gsf]) including approximately 200 affordable DUs<sup>1</sup>, approximately 245,000 gross square feet (gsf) of office use, a 350-seat replacement high school, a 350-seat new primary school, approximately 50,000 gsf of retail, use, and approximately 15,000 gsf of cultural community facility use, and approximately 150 below-grade accessory parking spaces. Based on the current design, two of the existing five Khalil Gibran International Academy school buildings currently on the project site would be retained and adaptively reused in the proposed development. The combined total area of ~~The proposed project would be approximately 1,255,285,000 gsf.~~

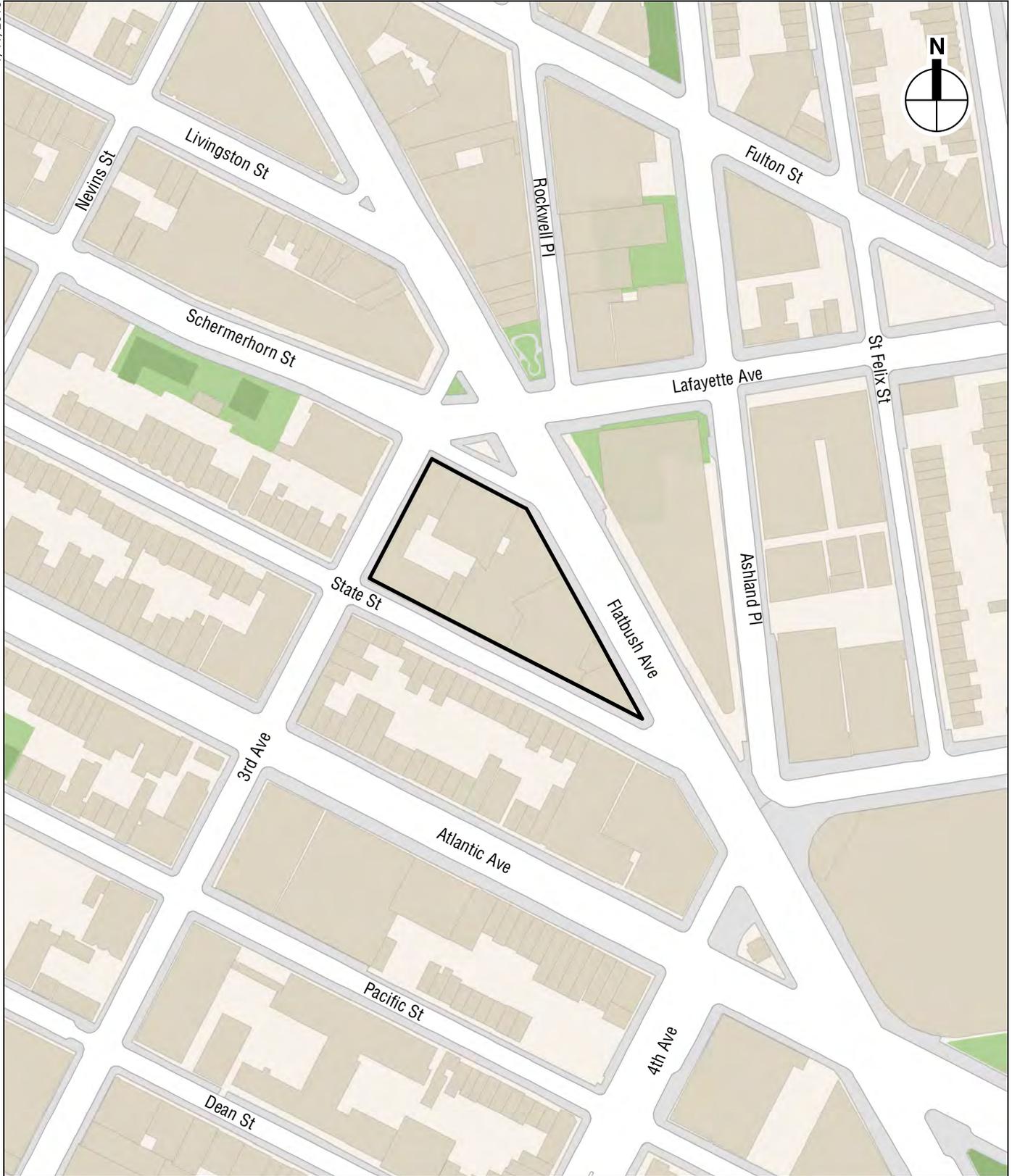
As shown in **Figure 1**, the project site consists of the 61,399-sf block bounded by Schermerhorn Street to the north, Flatbush Avenue to the east, State Street to the south, and 3rd Avenue to the west. It is located in Brooklyn Community District (CD) 2. The western portion of the project site is currently occupied by the Khalil Gibran International Academy, a public high school, which is operated by the Department of Education (DOE). The remainder of the site is currently a mix of residential and commercial property.

The proposed project would require the following several City and state discretionary approvals: (the “proposed actions”). The following discretionary zoning actions will be reviewed through the

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<sup>1</sup> As part of the proposed project, approximately 20 percent of the residential floor area would be affordable to households earning an average of 60 percent of Area Median Income (AMI); however, to ensure a conservative analysis in the EIS, the assessments of Indirect Residential Displacement in Chapter 3 and Child Care in Chapter 4 assume 184 affordable DUs and 225 affordable DUs, respectively.

1/11/2018



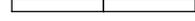
 Project Site



1/11/2018



 Project Site

0 200 FEET  


Uniform Land Use Review Procedure (ULURP): (i) a zoning text and map amendment changes to rezone the change the site from a underlying C6-2 to an C6-96 district ; (ii) transfer of City-owned property to ECF; (iii) lease of property by ECF to 80 Flatbush Avenue, LLC; and (iv) tax-exempt bond financing by ECF for the school portion of the project. The with a floor area ratio (FAR) of 18 on the affected block in the Special Downtown Brooklyn District (SDBD); (ii) zoning text changes affecting the proposed C6-9 district in the SDBD; (iii) zoning text changes would: (i) provide that in C6-6/SDBD, maximum FAR is 18.0 for a site with a school developed in conjunction with ECF (12.0 for residential, 18.0 for commercial/community facility); (ii) provide for special height, setback, and use regulations for the C6-6 district in the SDBD; (iii) to designate the Project rezoned area as a Mandatory Inclusionary Housing (Area (MIHA); (iv) zoning text changes to provide a special permit in C6-9 districts in the SDBD for a modification of tower lot coverage, height, setback, and ground-floor regulations, required parking and loading berths, and certain MIH) Area, except for that portion currently occupied by the school; and (iv) modify MIH ratio and distribution requirements for a site developed projects on zoning lots with sites owned by ECF; and (v) a special permit relating to regulations in conjunction with ECF (iv) above. Other discretionary actions will be the transfer, reallocation and lease of property among the developer, ECF, and the City to allow for the City schools in the new location, the proposed development, and ECF financing. Additionally, ECF would issue tax exempt bonds to facilitate construction of the schools, ECF would issue tax exempt bonds.

The proposed discretionary actions require review under City Environmental Quality Review (CEQR) and the State Environmental Quality Review Act (SEQRA). The environmental review provides a means for decision-makers and other government agencies to systematically consider environmental effects along with other aspects of project planning and design, to evaluate reasonable alternatives, and to identify, and mitigate where practicable, any significant adverse environmental impacts. As a disclosure document, the ~~Draft EIS~~ (DEIS) will also afford other stakeholders and the community the opportunity to meaningfully comment on the potential for significant adverse impacts. ECF ~~intends to serve is serving~~ as the lead agency for ~~this application.~~ the environmental review. The New York City Department of City Planning (DCP will serve as) is an Involved Agency.

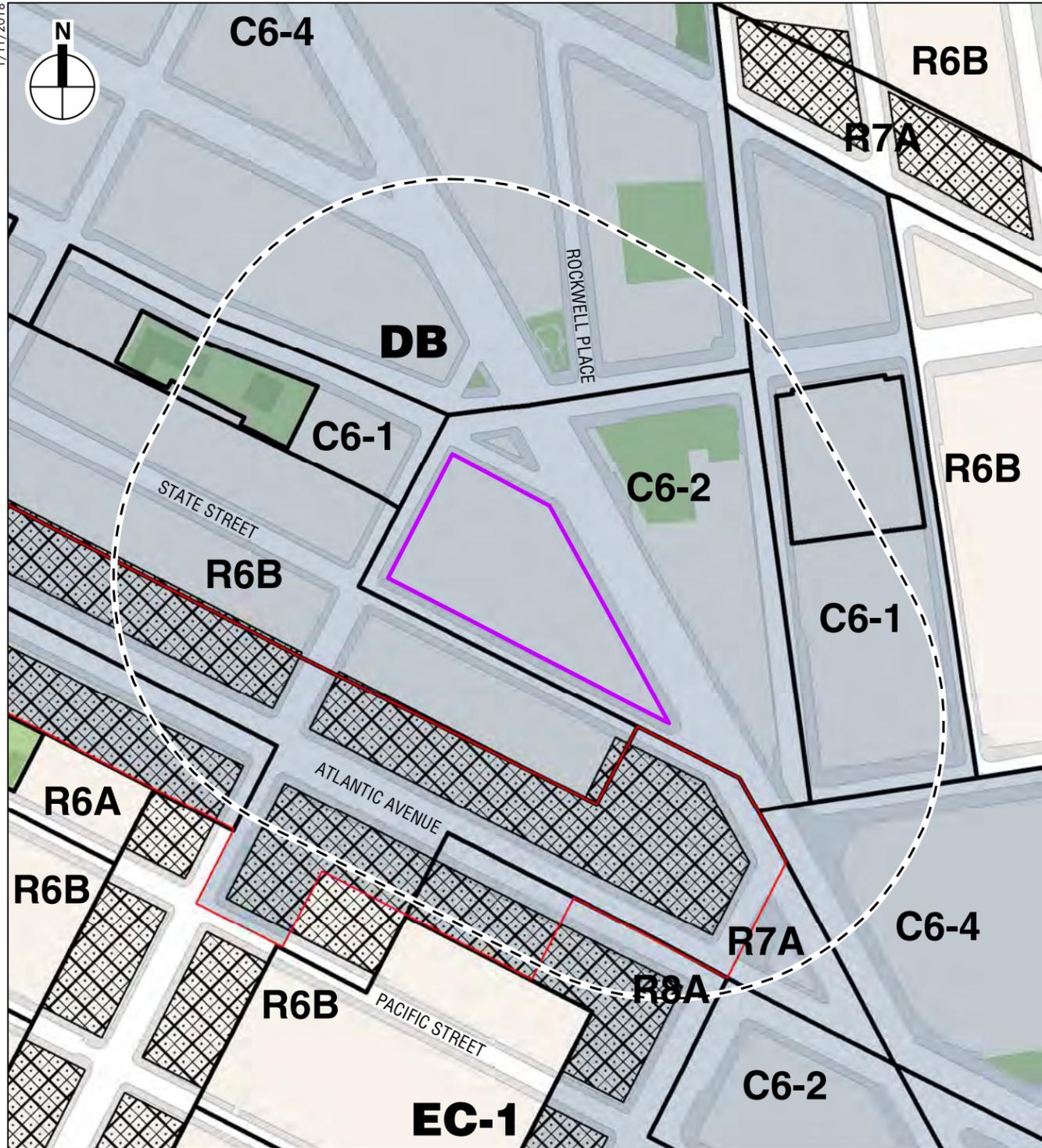
The scoping process is intended to focus the DEIS on those issues that are most pertinent to the proposed action. The process ~~at the same time~~ allows other agencies and the public a voice in framing the scope of the DEIS. The proposed scope of work for each technical area to be analyzed in the DEIS follows. Analyses will be conducted for one build year, 2025, by which time the full build-out associated with the proposed actions is expected to be complete.

## **B. PROJECT DESCRIPTION AND PURPOSE & NEED**

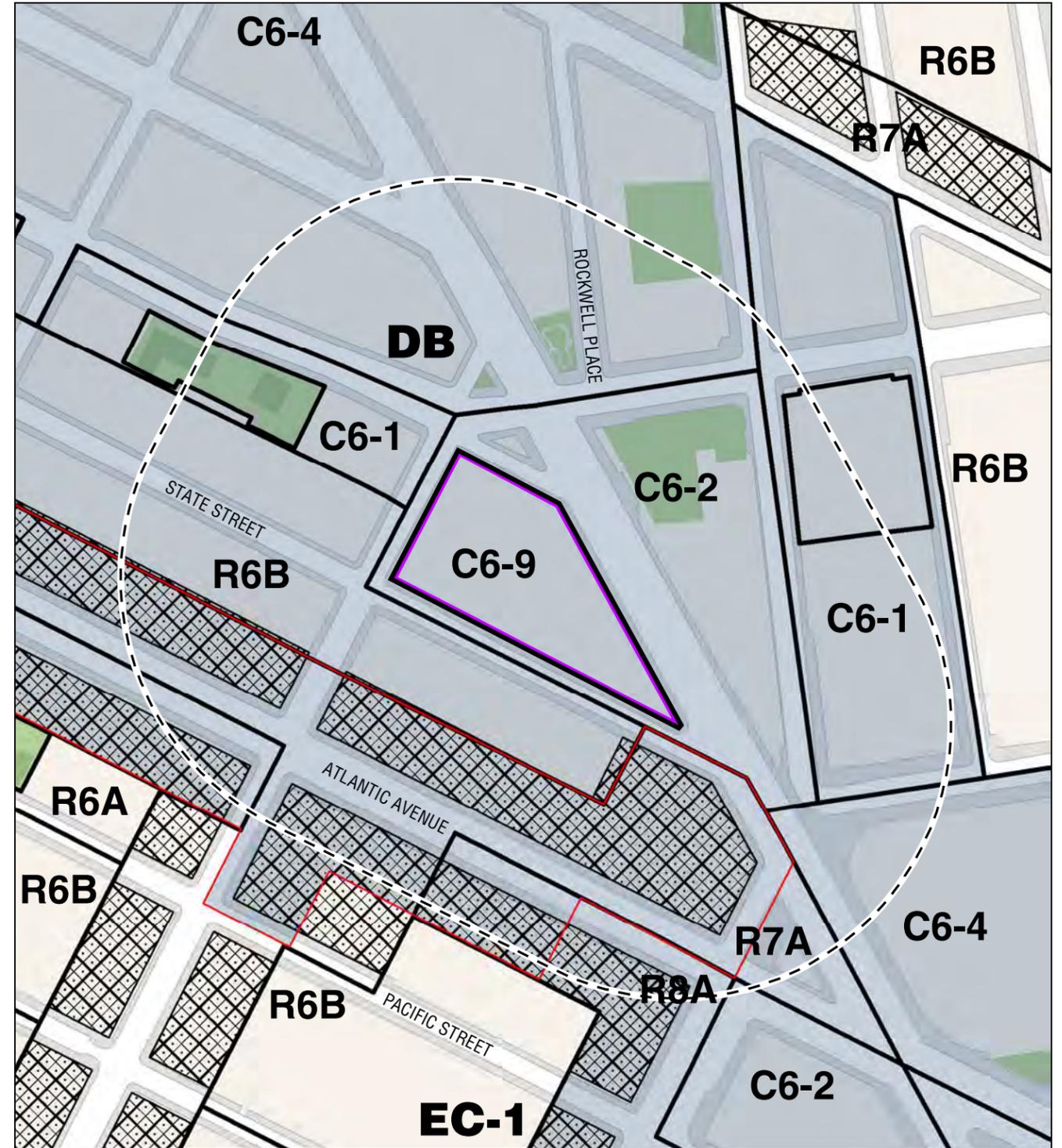
### **PROJECT AREA (EXISTING CONDITIONS) SITE**

The project site is Block 174, Lots 1, 9, 13, 18, 23, and 24 in Downtown Brooklyn. As shown in **Figure 1 and 2**, the project site consists of the 61,399-sf block bounded by Schermerhorn Street to the north, Flatbush Avenue to the east, State Street to the south, and 3rd Avenue to the west. It is located in Brooklyn Community District (CD) 2. The project site is currently zoned C6-2 (see **Figure 3**).

The western portion of the project site (Lot 1) is currently occupied by the Khalil Gibran International Academy, ~~which.~~ The Khalil Gibran International Academy is operated by comprised of five connected buildings that were constructed at different times (School Buildings 1 through 5):



EXISTING



PROPOSED

- Project Site
- Study Area (400-foot boundary)
- Zoning Districts
- C2-4 Commercial Overlay District
- Special Purpose District
- Atlantic Avenue Subdistrict

- School Building 1 is located at the New York City Department of Education (DOE)- northeast corner of 3rd Avenue and State Street;
- School Building 2 is located at 3rd Avenue and Schermerhorn Street (362 Schermerhorn Street);
- School Buildings 3 and 4 are located midblock on 3rd Avenue, between School Buildings 1 and 2; and
- School Building 5 is a townhouse located on State Street adjacent to School Building 2.

The remainder of the site currently contains approximately 8283,000 sf of commercial office use in two buildings, four residential units, a substance abuse treatment facility non-rent-stabilized DUs, and a small amount of retail use in two buildings. All residential and commercial leases are set to expire on or before 2019.

*(E) DESIGNATIONS ASSIGNED TO THE SITE*

Block 174, Lots 1, 9, 13, 18, 23, and 24 on Portions of the project site are were assigned an (E) Designation for hazardous materials and noise, listed in the New York City Department of City Planning (E) designation database as E-124, established in the Downtown Brooklyn Rezoning (CEQR No. 03DME016K, ULURP No. 040171 ZMK), dated June 28, 2004.

The With respect to hazardous materials, the (E) Designation applies to Block 174, Lots 9, 13, 18, 23, and 24. The (E) designation requires that a Phase I of the site be submitted to OER for review and approval, along with a soil and groundwater testing protocol. The New York City Office of Environmental Remediation (OER) will make a determination regarding whether remediation is necessary based on the results of the testing. If remediation is indicated from the test results, a proposed remediation plan must be submitted to OER for review and approval. The co-applicants must complete such remediation as determined necessary by OER, and provide documentation that the work has been satisfactorily completed. In addition, an OER-approved construction-related health and safety plan would be implemented during excavation and construction activities.

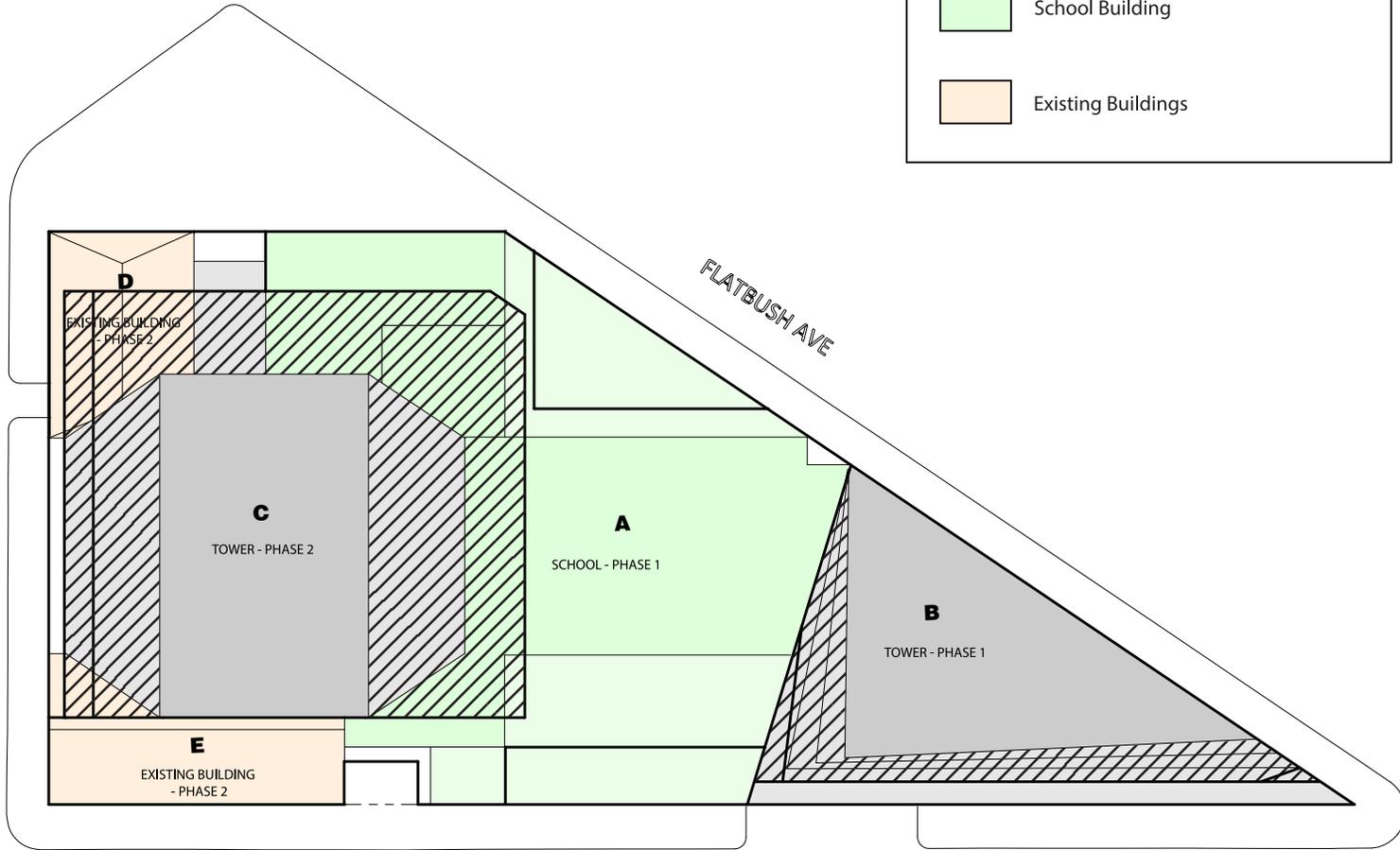
The (E) designation for noise applies to Block 174, Lots 9, 13, 18, 23, and 24 and requires that future uses must provide up to 40 dBA of window/wall attenuation to comply with CEQR requirements. In addition, mechanical equipment such as heating, ventilation, and air conditioning (HVAC), and elevator motors would utilize sufficient noise reduction devices to comply with applicable noise regulations and standards.

**PROPOSED PROJECT**

The proposed actions sought by the co-applicants would facilitate the development of the project site with three new buildings, including two mixed-use towers and new public school facilities (Buildings A, B, and C), and as currently designed, the adaptive reuse of two of the existing school buildings (Buildings D and E). As currently designed, the existing structures at the corner of Schermerhorn Street and 3rd Avenue (Building D) and State Street and 3rd Avenue (Building E) would be retained and adaptively reused for cultural community facility and retail space, respectively. See **Figures 4 and 5.**

Development of the proposed project would be governed by the use and density regulations of the SDBD and the proposed C6-9 zoning district, and the applicable bulk modifications sought under the special permit. The bulk modifications to height and setback requested under the special permit define the building envelope or maximum zoning envelope within which the proposed structures can

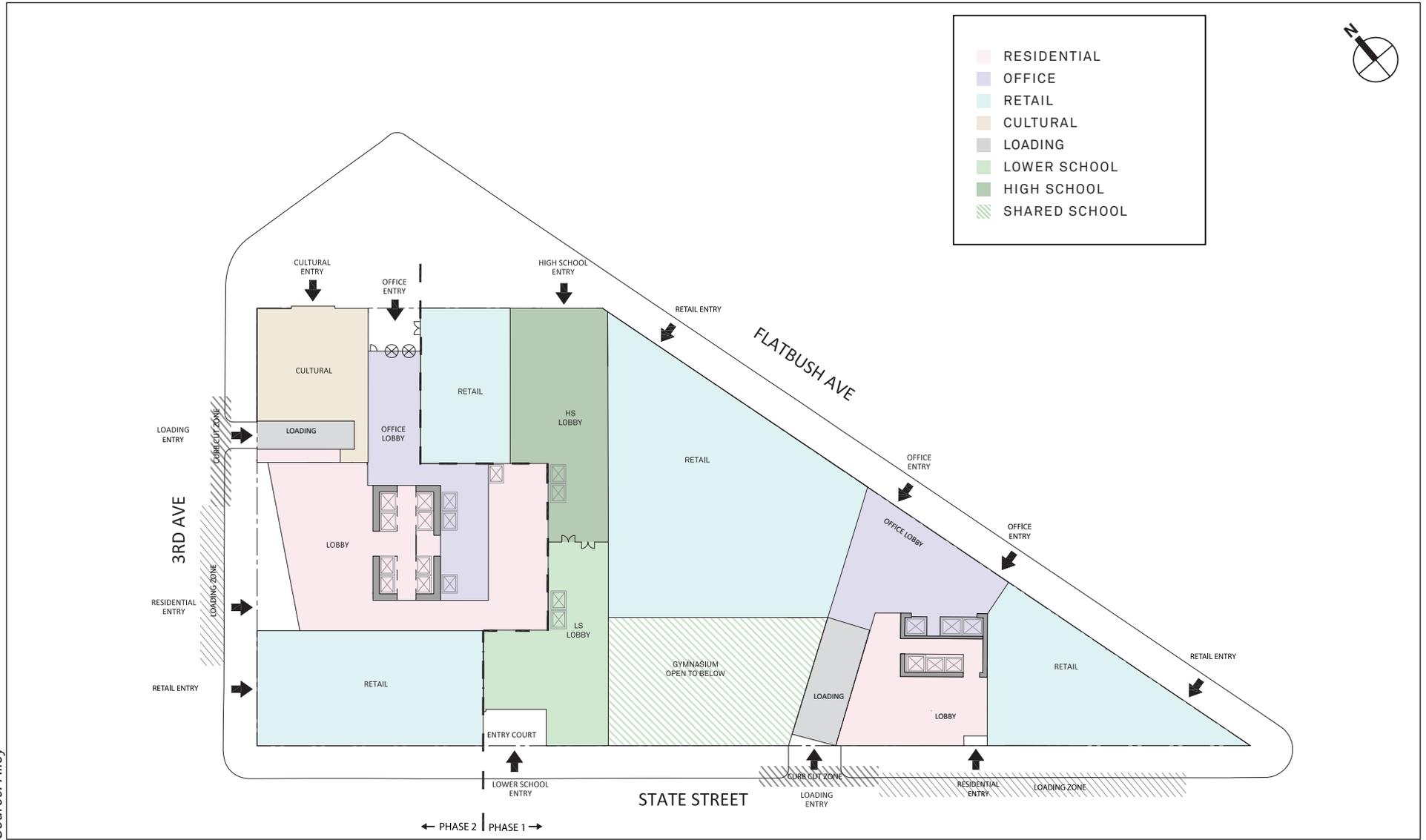
3RD AVE



STATE STREET

FLATBUSH AVE

Source: Alloy



## ECF 80 Flatbush Avenue

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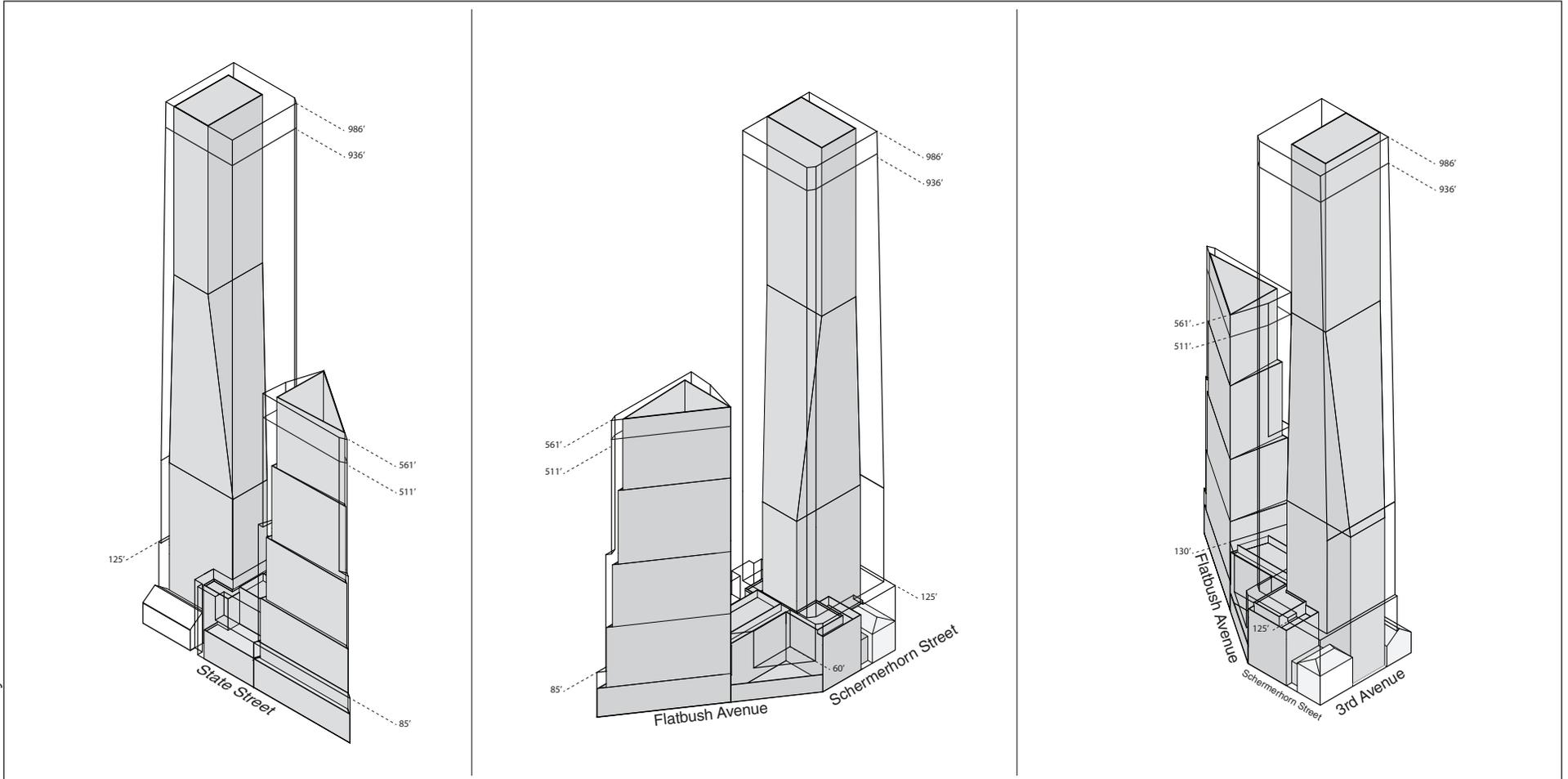
be built. The maximum zoning envelope for the proposed project is intended to provide design flexibility, and is larger than the space that would be occupied by the proposed buildings. Building C would not be constructed until the new school facilities are completed and the existing high school has relocated. The larger envelope is proposed in order to facilitate the complex and mixed-use nature of the program and to encourage/stimulate Class A commercial tenancy through the creation of larger floor plates. Because the maximum zoning envelope would encompass Building D and allow for its demolition and could partially extend into the footprint of Building E, the potential effects associated with the maximum zoning envelope are considered in the EIS. The maximum zoning envelope is shown in Figure 6.

In total, the proposed project would contain approximately 1,285,000 gsf. Building A would house the replacement high school and a new lower school in a building with anticipated heights ranging from 50 feet to 130 feet located in the center of the project site, with frontage along State and Schermerhorn Streets and Flatbush Avenue. The building would feature retail space along Schermerhorn Street and Flatbush Avenue. Building B would be a wedge-shaped mixed-use tower located at State Street and Flatbush Avenue on the easternmost portion of the project site. The building's residential entrance would be on State Street and the lobby entrance to the commercial office space would be on Flatbush Avenue. The building would rise to an anticipated height of approximately 560 feet. Building C would be mixed-use tower located on the western portion of the project site with an anticipated height of 986 feet. Residential access would be from 3rd Avenue and the lobby entrance to the office space would be from Schermerhorn Street. Proposed building heights are shown in Figure 6.

Under the maximum zoning envelope, the larger floorplates generally required for Class A office space could be accommodated within Building C and Building C could be built to the street walls of Schermerhorn Street and 3rd Avenue. Under the current design, Building D, the portion of the former school building located at the corner of Schermerhorn Street and 3rd Avenue, would be retained and adaptively reused as cultural community facility space. If Building D is not retained in the final design, cultural space would be included at this general location as part of the new Building C. The maximum zoning envelope would allow for the retention of most of Building E, the former original P.S. 15 building at 3rd Avenue and State Street, and its adaptive reuse with retail space.

The proposed project would be developed in two phases stages, beginning with five distinct buildings with a total the construction of approximately 1,255,000 gsf. Phase 1 would include the development of a structure Building A at the center of the site for, which would contain the new replacement high school and primary new lower school, and Building B, a wedge-shaped mixed-use tower on the eastern side portion of the project site (see Figures 4 through 9). Phase 1 would be constructed. Construction of Buildings A and B on the central portion and eastern side of the site would take place while the existing Khalil Gibran International Academy school buildings remain operational on the western side of the project site. Phase 2 Immediately following the relocation of the proposed project high school, the second phase of construction would begin and include the development of a rectangular-shaped tower between two of the existing school buildings that would be modified and adaptively reused. The existing school building at the southwestern corner of the project site would be repurposed as retail space, and the existing school building at the northwestern corner would be repurposed as cultural community space. Additional retail components would be located along Schermerhorn Street and Flatbush Avenue. Both the office and high school entrances would be along Flatbush Avenue, while the primary school entrance would be along State Street. Entry for the below-grade parking garage would be located along State Street. Please see Building C, as described above. The adaptive reuse of any retained portions of

Source: Alloy



existing Buildings D and E is proposed as part of the second phase of construction. Buildings A through E are shown in Figure 4 for the ground floor site plan.

**PROPOSED PROGRAM**

The proposed project would include approximately 830,000 gsf of residential use (up to 922 residential units, assuming a standard size of 900 sf/unit); DUs, including approximately 200 affordable DUs, approximately 245,000 gsf of office usespace; approximately 145,000 gsf of public school usespace (350-seat high school and 350-seat primary school); approximately 50,000 gsf of retail use; lower school), approximately 15,000 gsf for a cultural community facility; of retail space, and approximately 22,500 15,000 gsf of parking (150 accessory spaces). cultural community facility space.

The proposed project would establish a Mandatory Inclusionary Housing (MIH) area at the project site (with the exception of the portion currently owned by the City). This analysis will assume thirty percent of the residential floor area (up to 225 units) would be affordable and will be targeted for incomes that are an average of 80 percent of Area Median Income (AMI). However, it is possible that twenty five percent of the residential floor area (up to 200 units) would be affordable and will be targeted for incomes that are an average of 60 percent of AMI. The remainder of the units would be a mix of rental and for sale units at market rates.

The proposed program is detailed in Table 1 below.

With the proposed project actions, the project site would be developed to a maximum FAR of 18, as compared to the maximum permitted FAR of 6.5 under the No Action scenario condition. The agreements development agreement between ECF and 80 Flatbush Avenue, LLC will would include certain a number of development restrictions and obligations, as discussed below.

**Table 1**  
**Proposed Program**

<u>Use</u>	<u>Size</u>
<b><u>Public School</u></b>	<u>145,000 gsf</u>
<i>High School</i>	<u>350-seat</u>
<i>Lower School</i>	<u>350-seat</u>
<b><u>Use Group 2 (Residential)</u></b>	<u>830,000 gsf</u>
<b><u>Residential DUs</u></b>	<u>922 DUs<sup>1</sup></u>
<i>Affordable DU Count</i>	<u>~200 DUs</u>
<b><u>Use Group 6 (Retail)</u></b>	<u>50,000 gsf</u>
<b><u>Office Space</u></b>	<u>245,000 gsf</u>
<b><u>Community Facility</u></b>	<u>15,000 gsf</u>
<b><u>Total</u></b>	<b><u>1,285,000 gsf</u></b>
<b><u>Notes:</u></b>	
<u><sup>1</sup> Assumes average DU size of 900 sf. 900 sf per DU was assumed as it is deemed a reasonable assumption based on real estate trends for this location and is comparable with other environmental studies in Downtown Brooklyn.</u>	

**SITE ACCESS**

The proposed project would be designed to integrate with an independent improvement project being undertaken by the New York City Department of Transportation (DOT) to close Schermerhorn Street to traffic between 3rd Avenue and Flatbush Avenue, allowing for an enhanced pedestrian experience. Entrances to retail and school components of Buildings A and C

on Schermerhorn, Flatbush and 3rd Avenues were designed to set back from the sidewalk wherever possible to improve pedestrian circulation. Both the office and high school entrances would be along Flatbush Avenue and Schermerhorn Street. The main entrance to the lower school and student drop off/pick up location would be along State Street. Residential entrances would be located along 3rd Avenue and State Street. Entrances to the retail components would be along Flatbush Avenue and 3rd Avenue. Entries for loading areas would be located along State Street and 3rd Avenue. Please see **Figure 5** for the ground-floor site plan.

#### SOLID WASTE DISPOSAL

As part of project planning, building design and operation will incorporate on-site trash storage to avoid placement of trash on the sidewalks. The proposed project would generate a net increase of approximately 19.7 tons of solid waste per week, and approximately 67 percent (or 13.3 tons) of the incremental solid waste generated would be handled by the City of New York Department of Sanitation (DSNY). Solid waste handled by DSNY would be containerized and either picked up curbside or at specified locations within project buildings. Curbside pickup would entail the loading of trash into 8-cubic yard containers, which would be wheeled out onto the street for pickup by DSNY rear-loader trucks. With sufficient on-site location and access, DSNY “roll-on, roll-off” service could also be provided. Under either option, trash would be placed within containers and kept off sidewalks thereby minimizing rodents, odors, and other related nuisances. Under the roll-on, roll-off option, refuse bags would be loaded into mechanized roll-on, roll-off containers located inside project buildings for pickup with further compaction. DSNY’s roll-on, roll-off container-bearing trucks require special site considerations, such as minimum space requirements for container pads and 20-foot clearance. In addition, compactor containers are not allowed in designated loadings docks and must be located in supplemental loading areas.

As discussed above, loading areas would generally be located along State Street and 3rd Avenue. Project constraints associated with roll-on, roll-off service include the limited availability of space for compactor containers, the mix of uses proposed within the same building(s), and the amount of required ground-floor lobby space, all of which may complicate the provision of roll-on, roll-off service. However, project designs are preliminary and refinements to the site plan, including details related to loading areas and truck access, are expected as the proposed project moves forward through the ULURP process. The co-applicants will coordinate the location of solid waste staging areas (and the location of compactor containers and truck access, as necessary), with the DSNY. The estimated 6.4 tons of commercial solid waste would be hauled away by private carters and handled in a similar manner.

#### DESIGN OF SCHOOL FACILITIES

The designs of the replacement high school and new lower school may be integrated to share some common areas. Both schools would have outdoor areas on the rooftops of their respective buildings. In addition to classrooms, the school facilities would also contain administrative spaces, a gymnasium, a gymnasium, libraries, art and science rooms, a medical facility, cafeterias, and kitchen facilities. The proposed new schools together would employ approximately 70 teachers, administrators, and support staff. The replacement facility for Khalil Gibran International Academy would be entered off of Schermerhorn Street, and the lower school facility would be entered off of State Street. Both schools would be designed to New York City School Construction Authority’s (SCA) building standards. The lower school classrooms would occupy the lower portion of the building with an outdoor play space on the southern portion of the building’s roof.

The high school classrooms would occupy the upper portion of the building with an outdoor terrace space fronting Flatbush Avenue adjacent to the high school cafeteria.

The design and construction of the school facilities will comply with or exceed the energy efficiency standards of SCA's green building standards. The school facilities will be designed to reduce the use of both energy and potable water beyond that required by the current New York City building code.

## **DISCRETIONARY AND OTHER APPROVALS**

The co-applicants, 80 Flatbush Avenue, LLC, and ECF are seeking ~~the following several~~ City and state discretionary approvals.

The following discretionary zoning actions will be reviewed through the Uniform Land Use Review Procedure (ULURP): (i) ~~a zoning text and map amendment changes to rezone~~ ~~change the site from an underlying~~ C6-2 to an C6-9-6 district ; (ii) ~~transfer of City owned property to ECF; (iii) lease of property by ECF to 80 Flatbush Avenue, LLC; and (iv) tax exempt bond financing by ECF for the school portion of the project, with a floor area ratio (FAR) of 18 on the affected block within the SDBD; (ii) zoning text changes affecting the proposed C6-9 district in the SDBD; (iii) zoning text changes to designate the rezoned area as a Mandatory Inclusionary Housing Area (MIHA); (iv) zoning text changes to provide a special permit in C6-9 districts in the SDBD for a modification of tower lot coverage, height, setback, and ground-floor regulations, required parking and loading berths, and certain MIH requirements for projects on zoning lots with sites owned by ECF; and (v) a special permit relating to regulations in (iv) above. Other discretionary actions will be the transfer, reallocation and lease of property among the developer, ECF, and the City to allow for the City schools in the new location, the proposed development, and ECF financing. Additionally, ECF would issue tax exempt bonds to facilitate construction of the schools.~~

~~The zoning text changes would: (i) provide that in C6-6/SDBD, maximum FAR is 18.0 for a site with a school developed in conjunction with ECF (12.0 for residential, 18.0 for commercial/community facility); (ii) provide for special height, setback, and use regulations for the C6-6 district in the SDBD; (iii) designate the Project Area as a Mandatory Inclusionary Housing (MIH) Area, except for that portion currently occupied by the school; and (iv) modify MIH ratio and distribution requirements for a site developed in conjunction with ECF.~~

~~To facilitate construction of the schools, ECF would issue tax exempt bonds.~~

## **PURPOSE AND NEED OF THE PROPOSED PROJECT**

In order to increase school capacity and improve school facilities, and in furtherance of the goals of the comprehensive development plan for Downtown Brooklyn, the City's affordable housing plan, and the Brooklyn Cultural District, ECF has proposed the project site as the location for a new mixed-use development. ECF is a public benefit corporation established in 1967 by the New York State Legislature to provide funds for combined occupancy structures including school facilities in New York City. ~~The Fund~~ECF serves as a financing and development vehicle for DOE, encouraging the development of new public schools as part of mixed-use projects in which the public component (~~i.e., part of replacement playground~~) is financed by tax-exempt bonds. ECF uses ground rents, lease payments, and/or tax equivalency payments from the non-school portions of the development to pay the debt service on the bonds issued to finance the public facilities. Future revenues from the non-school portions of the development are used to pay the debt service of the new school facility. ~~The Fund~~ECF enhances the ability of DOE to construct new school

## ECF 80 Flatbush Avenue

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facilities, thereby increasing the number of seats for the entire school system. At the same time, the Fund encourages comprehensive neighborhood development by facilitating new mixed-use developments that feature new school facilities.

The existing ~~high school~~ Khalil Gibran International Academy consists of five connected buildings ~~on the site that~~ date from the late 1800s, and the facilities are outmoded and technologically obsolete. The configuration of the buildings results in narrow hallways and constrained conditions. The configuration of the existing school results in narrow hallways and constrained conditions. The school lacks an appropriate cafeteria; the seating area serves less than one-third of the student population per period and the kitchen is only set up for heating food. The school also has no gym or auditorium, causing any student assembly to be held in the library which has a capacity of approximately 65 students. ~~(the current enrollment is 270).~~ Although students have access to open space in the courtyard, the space is limited in size. The school lacks an adequate number of restrooms, including some floors with none. The electrical, ventilation, and acoustical systems are inadequate to serve the needs of the buildings. In addition, the facility is not Americans with Disabilities Act (ADA)-accessible. Overall, the current Khalil Gibran International Academy has a cramped learning environment and lacks the appropriate facilities for high school achievement as well as available space for growth. The proposed actions would result in the replacement of the existing Khalil Gibran International Academy with a new state-of-the-art facility. These improvements will help achieve a better learning environment by providing modern educational facilities.

Construction of the proposed ~~addition~~ project would also include a new 350-seat lower school, which would provide additional public school capacity at the primary ~~lower~~ school level in CSD 15. According to the most recent New York City Department of Education (DOE) data on school capacity, enrollment, and utilization for the 2014-2015 school year, primary schools in CSD 15 are operating at 122 percent capacity.

In response to the need for a replacement facility for Khalil Gibran International Academy and additional capacity in CSD 15 and given that the area is heavily supported by many transit options, ECF identified the project site as a location with the potential to attract a new mixed-use development, allowing new school facilities to be constructed without the use of DOE capital funding. In 2016, ECF released a Request for Expressions of Interest (RFEI) and selected Alloy Development to redevelop the site, after consideration of competitive bidders.

A comprehensive development plan to facilitate the continued growth of Downtown Brooklyn was adopted in 2004 to encourage commercial development through a series of zoning map and zoning text changes; however, the area was developed predominantly with residential use instead. In an effort to realize the goals set forth in the Downtown Brooklyn rezoning plan, the proposed development would incorporate commercial space. Thus, the proposed project would strengthen New York City's economic base by providing new, modern office space in the City's third-largest central business district. The development would attract new businesses and help retain existing businesses, as well as help achieve the City's goal of meeting the demand City-wide for 60 million square feet of office space expected during the next decade. In addition, the project will provide new employment opportunities, and create new retail opportunities to meet the needs of local workers, residents, and visitors.

~~As~~ The project site is located adjacent to the Brooklyn Cultural District, and the proposed project would support and enhance the district's goals, by encouraging both economic and cultural development. The proposed project would introduce a dynamic new mixed-use development,

including cultural community space, which would enliven the block and bring amenities to the local residents, artists, and visitors in the district.

The proposed actions also would facilitate the productive use of the project site by creating a new residential development of up to 922 units. ~~Up to thirty percent of the non-City-owned residential floor area would be designated as DUs, including approximately 200 affordable, pursuant to the Mandatory Inclusionary Housing Program, DUs.~~ This affordable housing would advance a City-wide initiative to build and preserve ~~200,000~~ 300,000 affordable units ~~over 10 years~~ DUs by 2026 in order to support low- to middle-income New Yorkers with a range of incomes, ~~from the very lowest to those in the middle class.~~

## ANALYSIS FRAMEWORK FOR ENVIRONMENTAL REVIEW

The EIS analyses will be undertaken pursuant to SEQRA, consistent with ECF practices. The *New York City Environmental Quality Review (CEQR) Technical Manual* will generally serve as a guide with respect to environmental analysis methodologies and impact criteria for evaluating the effects of the proposed project. In disclosing impacts, the EIS considers the proposed project's potential adverse impacts on the environmental setting. It is anticipated that the proposed project would be operational in 2025. Consequently, the environmental setting is not the current environment, but the future environment. Therefore, the technical analyses and consideration of alternatives first assess existing conditions and then forecast these conditions to 2025 (~~“Future Without (the Proposed Project)”~~ “No Action” condition) for the purposes of determining potential impacts of the proposed project (~~“Future (the “With the Proposed Project”)-Action” condition~~).

### THE FUTURE WITHOUT THE PROPOSED PROJECT ACTIONS

For the purposes of the EIS, it is assumed that in the future without the proposed ~~project actions~~ (the “No Action” condition), the non-City-owned portion of the project site would be developed with an as-of-right mixed-use building (~~330,400~~ 400 feet in height, including bulkhead) that complies with the current zoning regulations, and the Khalil Gibran International Academy would remain in its existing facility (see Figure 7). The building development under the No Action condition would contain approximately 252,590 gsf of market rate residential use (approximately 281 ~~units~~ DUs), approximately 44,877 ~~43,750~~ 43,750 gsf of public school ~~use~~ space, approximately 41,200 ~~53,185~~ 53,185 gsf of retail ~~use~~ space, approximately 2,108 gsf of community facility space, and approximately 20,000 gsf of parking ~~use~~ (approximately 130 accessory spaces). The No Action ~~scenario condition~~ would be developed with a total of approximately ~~358,667~~ 371,633 gsf with a maximum permitted FAR of 6.5. In addition, approximately 6,379 sf of passive open space would be provided at the easternmost portion of the project site at Flatbush Avenue and State Street. For each technical analysis in the EIS, the No Action condition will also incorporate approved or planned development projects within the appropriate study area that are likely to be completed by the analysis year.

### THE FUTURE WITH THE PROPOSED PROJECT ACTIONS

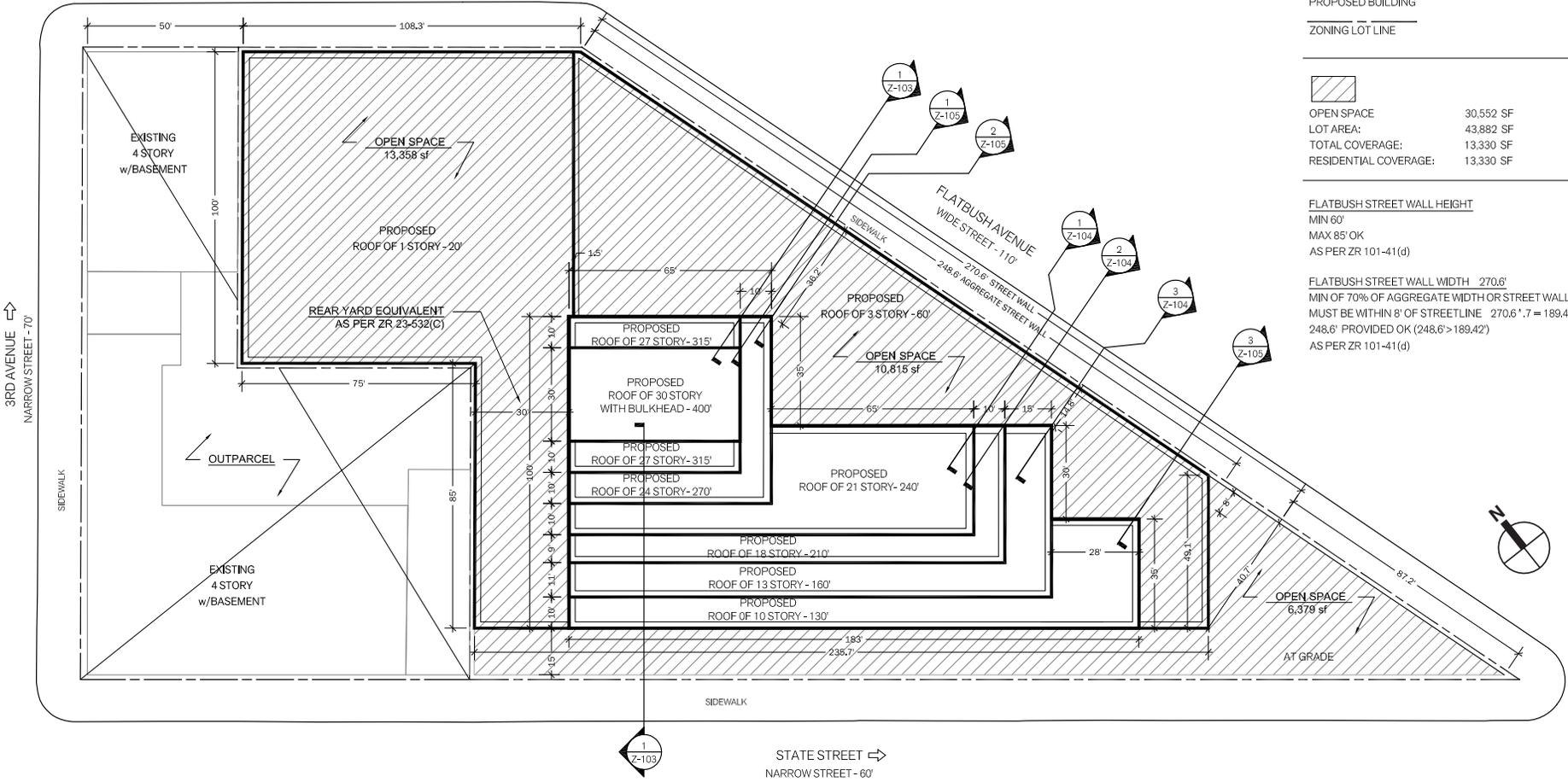
For each of the technical areas of analysis identified in the *CEQR Technical Manual*, conditions with the proposed project will be compared to the No Action condition (see **Table 1-2**). The proposed project's buildings (including building heights), and the maximum zoning envelope are shown in Figure 6. Illustrative renderings of the proposed project are shown in **Figures 8 through 10**.

**SITE PLAN DIAGRAM**

1/32" = 1'-0"



SCHERMERHORN STREET →  
WIDE STREET - 80'



**LEGEND**

**C6-2**

RESIDENTIAL DISTRICT EQUIVALENT R8

PROPOSED BUILDING

ZONING LOT LINE



OPEN SPACE	30,552 SF
LOT AREA:	43,882 SF
TOTAL COVERAGE:	13,330 SF
RESIDENTIAL COVERAGE:	13,330 SF

**FLATBUSH STREET WALL HEIGHT**

MIN 60'  
MAX 85' OK  
AS PER ZR 101-41 (d)

FLATBUSH STREET WALL WIDTH 270.6'  
MIN OF 70% OF AGGREGATE WIDTH OR STREET WALL  
MUST BE WITHIN 8' OF STREETLINE 270.6' \* 7 = 189.42'  
248.6' PROVIDED OK (248.6' > 189.42')  
AS PER ZR 101-41 (d)





Illustrative Renderings of Proposed Project  
Flatbush Avenue Facing Southeast





**Table 12**  
**Comparison of No Action and With Action Scenarios/Conditions**

Use (GSF)	No Action Scenario/Condition	With Action Scenario/Condition	Increment
<b>Residential</b>	252,590 gsf	830,000 gsf	+577,410 gsf
<i>Dwelling Units</i> <sup>1</sup>	281 DUs	922 DUs	+641 DUs
<i>Affordable Unit Count</i>	0 DUs	225-200 DUs	+225-200 DUs
<b>Office</b>	0 gsf	245,000 gsf	245,000 gsf
<b>Public School</b>	44,877-43,750 gsf (1 public high school)	420-145,000 gsf (1 public primary/low school 1 public high school)	+75,123-101,250 gsf (1 public primary/low school)
<i>Primary School Students</i>	0	350	350
<i>High School Students</i>	312	350	38
<i>Staff</i>	17	70	53
<b>Retail</b>	41,200-53,185 gsf	50,000 gsf	+8,800-3,185 gsf
<b>Community Facility</b>	0-108 gsf	15,000 gsf	+15,000-12,892 gsf
	0 surface	0 surface	0 surface
<b>Accessory Parking</b>	130 enclosed	450 enclosed	+20-130 enclosed

**Notes:** <sup>1</sup>Assumes average unit size of 900 sf. 900 sf per unit was assumed as it is deemed a reasonable assumption based on real estate trends for this location and is comparable with other environmental studies in Downtown Brooklyn.  
Assumes 1 staff for every 10 students. Assumes no parents walking students for high school.

**ENVIRONMENTAL REVIEW PROCESS**

Based on its review of the EAF, ECF has determined that the proposed actions and project have the potential to result in significant environmental impacts and, therefore, pursuant to SEQRA procedures, has issued a Positive Declaration requiring that an EIS be prepared in conformance with all applicable laws and regulations, including the State Environmental Quality Review Act (SEQRA), the City’s Executive Order No. 91, CEQR regulations (August 24, 1977) and the guidelines of the 2014 CEQR Technical Manual. In addition, ECF has published this accordance with SEQRA, the Draft Scope of Work for to prepare the purpose of accepting comments EIS was issued on the Draft Scope, May 24, 2017. The public, interested agencies, Brooklyn Community Board 2, and elected officials were invited to comment on the DSOW, either in writing or orally, at a public scoping meeting held on June 28, 2017 at the Board of Education, 131 Livingston Street, Brooklyn, New York. Comments received during the DSOW’s public hearing, meeting and written comments received through the close of the comment period, will be were considered and incorporated as appropriate into a Final Scope of Work. The Final Scope of Work will be used the FSOW. ECF, as a framework for preparing lead agency oversaw the preparation of the FSOW, which incorporates all relevant comments made during the scoping process and includes any other necessary changes to the scope of work for the EIS. **Appendix A** includes responses to comments made on the DSOW. The written comments received are included in **Appendix B**. The DEIS will be prepared in accordance with the FSOW.

Once ECF has determined that the DEIS is complete, a Notice of Completion will be prepared and distributed/published in accordance with applicable regulations. The DEIS will then be subject to additional public review, in accordance with CEQR and SEQRA procedures, with a public hearing and a period for public comment. A Final EIS (FEIS), and response to comments on the DEIS, would be accompanied by a Notice of Completion. The lead agency will then make SEQRA findings based on the FEIS, before making a decision on project approval.

Once ECF has determined that the DEIS is complete, the document will be made available for public review and comment. A public hearing will be held on the DEIS in conjunction with the City Planning Commission hearing on the land use applications to afford all interested parties the

opportunity to submit oral and written comments. The record will remain open for 10 days after the public hearing to allow additional written comments on the DEIS. At the close of the public review period, a Final EIS (FEIS) will be prepared that will respond to all substantive comments made on the DEIS, along with any revisions to the technical analyses necessary to respond to those comments. The FEIS will then be used by the decision-makers to evaluate CEQR findings, which address project impacts and proposed mitigation measures, in deciding whether to approve the requested discretionary actions, with or without modifications.

## **C. SCOPE OF WORK**

The scope of work contained below has been revised to include two additional technical areas to address Public Health and Energy.

### **TASK 1: PROJECT DESCRIPTION**

The first chapter of the EIS introduces the reader to the proposed project and provides the project data for which impacts are assessed. The chapter will contain a brief history of the uses on the project area; the proposed development program; a description of the design of the proposed buildings; figures depicting the proposed development; and a discussion of the approvals required, procedures to be followed, and a description of the No Action condition. The role of the lead agency for SEQRA will also be described as well as the environmental review process to aid in decision-making.

### **TASK 2: LAND USE, ZONING, AND PUBLIC POLICY**

The proposed project will require city and state discretionary actions, including a city land use approval for a rezoning and ECF lease terms. Therefore, the EIS will include an assessment of the proposed project's consistency with land use, zoning, and public policy, in accordance with the *CEQR Technical Manual*. A detailed assessment will be conducted. The analysis will include information on existing land use now and in the future without the proposed ~~project actions~~ to set the context in which many of the other technical tasks may be understood. The assessment of land use, zoning, and public policy will consist of the following tasks:

- Provide a brief development history of the project site and study area. The study area will include the blocks immediately surrounding the project site and land uses within an approximately 400-foot radius.
- Based on existing studies, information included in existing geographic information systems (GIS) databases for the area and field surveys, identify, describe, and graphically present predominant land use patterns and site utilization on the project site and in the 400-foot study area. Recent land use trends and major factors influencing land use trends will be described.
- Describe and map existing zoning and any recent zoning actions on the project site and in the 400-foot study area.
- Summarize other public policies and plans that may inform development of the project site and study area, including any formal neighborhood or community plans.
- Prepare a list of other projects expected to be built in the study area that would be completed before or concurrent with the project. Describe the effects of these projects on land use patterns and development trends. Also, describe any pending zoning actions or other public policy actions that could affect land use patterns and trends in the study area.

- Describe the proposed actions and provide an assessment of the impacts of the proposed project on land use and land use trends, zoning, and public policy. Consider the effects related to issues of compatibility with surrounding land uses, consistency with zoning and other public policy initiatives, and the effect of the project on development trends and conditions in the area.

If necessary, mitigation measures to avoid or reduce potential significant adverse impacts will be identified.

### **TASK 3: SOCIOECONOMIC CONDITIONS**

According to the *CEQR Technical Manual*, the five principal issues of concern with respect to socioeconomic conditions are whether a proposed action could result in significant adverse impacts due to: (1) direct residential displacement; (2) direct business displacement; (3) indirect residential displacement; (4) indirect business displacement; and (5) adverse effects on a specific industry.

The proposed project would not result in any direct residential displacement; although there are four residential units currently on the project site (at 505 State Street), the units would be vacated prior to redevelopment of the site in the No Action condition. None of the current residential units are rent stabilized, rent controlled, or loft law protected. The proposed project would not result in direct business displacement since the existing businesses on the project site would be vacated prior to redevelopment of the site in the No Action condition. The proposed project would not significantly affect business conditions in any industry or category of businesses within or outside the study area, nor would it substantially reduce employment or impair viability in a specific industry or category of businesses. Therefore, assessments are not warranted for direct residential and business displacement, and potential adverse effects on a specific industry.

With respect to indirect residential and business displacement, the proposed project would exceed the CEQR thresholds warranting assessment (commercial development of 200,000 sf or more, 200 or more residential units); the scope of work for these analyses is described below.

#### *INDIRECT RESIDENTIAL DISPLACEMENT*

The analysis will start with a preliminary assessment that presents demographic and residential market trends and conditions for the study area using U.S. Census data, American Community Survey data, New York City Department of Finance Real Property Assessment Data (RPAD) data, as well as current real estate market data. Following *CEQR Technical Manual* guidelines, the preliminary assessment will perform the following step-by-step evaluation:

- **Step 1:** Determine if the proposed project would add new population with higher average incomes compared to the incomes of the study area population and any new population expected to reside in the study area in the future without the project. If the expected average incomes of the new population would be similar to the average incomes of the study area populations and the population added by any planned development projects in the future, no further analysis is necessary. If the project would introduce a more costly type of housing compared to existing housing such that the expected average incomes of the new population would exceed the average incomes of the study area population, then Step 2 of the analysis will be conducted.

- **Step 2:** Determine if the proposed project population is large enough to affect real estate market conditions in the study area. If the population increase is greater than 5 percent in the study area as a whole or within any identified subareas, then Step 3 will be conducted.
- **Step 3:** Consider whether the study area has already experienced a readily observable trend toward increasing rents and the likely effect of the action on such trends.

#### *INDIRECT BUSINESS DISPLACEMENT*

Following *CEQR Technical Manual* guidelines, the analysis will describe and characterize conditions and trends in employment and businesses within ¼-mile or ½-mile study area using the most recent available data from public and private sources such as New York State Department of Labor, the U.S. Census Bureau, and ESRI Business Analyst, as well as discussions with local real estate brokers, as necessary. This information will be used in a preliminary assessment to consider:

- Whether the proposed project would introduce enough of a new economic activity to alter existing economic patterns;
- Whether the proposed project would add to the concentration of a particular sector of the local economy enough to alter or accelerate existing economic patterns; and
- Whether the proposed project would indirectly displace residents, workers, or visitors who form the customer base of existing businesses in the area.

The proposed project would not introduce retail uses in excess of 200,000 square feet, and therefore an assessment of indirect business displacement due to retail market saturation (i.e., competition) is not warranted.

#### **TASK 4: COMMUNITY FACILITIES AND SERVICES**

As defined for CEQR analysis, community facilities are public or publicly funded schools, libraries, child care centers, health care facilities and fire and police protection. A project can affect community facility services directly, when it physically displaces or alters a community facility; or indirectly, when it causes a change in population that may affect the services delivered by a community facility. This chapter of the DEIS will evaluate the effects on community services due to the proposed project.

The proposed project would involve the construction of a replacement facility for the public high school on the project site, as well as the construction of a new public primary school. Therefore, an analysis of the project's effects on public schools will be provided.

According to the *CEQR Technical Manual*, preliminary thresholds indicating the need for detailed analyses of indirect effects on community facilities are as follows:

- **Public Schools:** More than 50 new elementary/middle school or 150 high school students. For Brooklyn, an increase of more than 121 units exceeds the threshold for elementary/middle school and more than 1,068 units for high school.
- **Libraries:** A greater than 5 percent increase in the ratio of residential units to libraries in the borough. For Brooklyn, this is equivalent to residential population increase of 734 residential units.
- **Health Care Facilities:** The ability of health care facilities to provide services for a new project usually does not warrant a detailed assessment under CEQR. Generally, a detailed assessment of health care facilities is included only if a proposed project would directly affect the physical

operations of, or access to and from, a hospital or public health clinic, or if a proposed action would create a sizeable new neighborhood where none existed before.

- Child Care Facilities (publicly funded): More than 20 eligible children based on the number of new low/moderate-income residential units by borough. For Brooklyn, an increase of 110 low/moderate-income residential units exceeds this threshold.
- Fire Protection: The ability of the fire department to provide fire protection services for a new project usually does not warrant a detailed assessment under CEQR. Generally, a detailed assessment of fire protection services is included only if a proposed action would directly affect the physical operations of, or access to and from, a fire station house, or if a proposed action would create a sizeable new neighborhood where none existed before.
- Police Protection: The ability of the police department to provide public safety for a new project usually does not warrant a detailed assessment under CEQR. Generally, a detailed assessment of police protective services is included only if a proposed action would directly affect the physical operations of, or access to and from, a precinct house, or if a proposed action would create a sizeable new neighborhood where none existed before.

Based on these thresholds, the proposed project is not expected to trigger detailed analyses of outpatient health care facilities or police and fire protection serving the project area. However, the proposed project's number of anticipated residential units will require analyses for public schools, publicly funded child care facilities, and libraries. This chapter will therefore include analyses of public schools, publicly funded child care, and libraries, following the guidance of the *CEQR Technical Manual*. These analyses would include the tasks described below.

#### *PUBLIC SCHOOLS*

The analysis of elementary/middle and high schools will include the following tasks:

- Identify schools serving the project area and discuss the most current information on enrollment, capacity, and utilization from the New York City Department of Education.
- Based on the data provided from the Department of Education and DCP, future conditions in the area without the proposed project will be determined.
- Based on methodology presented in the *CEQR Technical Manual*, the potential impact of students generated by the proposed project on schools will be assessed.

#### *PUBLICLY FUNDED CHILD CARE*

The analysis of child care will include the following tasks:

- Identify existing publicly funded group child care and Head Start facilities within approximately 1.5 miles of the project area.
- Describe each facility in terms of its location, number of slots (capacity), and existing enrollment. Care will be taken to avoid double-counting slots that receive both ACS and Head Start funding. Information will be based on publicly available information and/or consultation with the Administration for Children's Services' Division of Child Care and Headstart (CCHS).
- Any expected increases in the population of children under 12 within the eligibility income limitations, based on CEQR methodology, will be discussed as potential additional demand, and the potential effect of any population increases on demand for publicly funded group child care and Head Start services in the study area will be assessed. The potential effects of the

additional eligible children resulting from the proposed project will be assessed by comparing the estimated net demand over capacity to the net demand over capacity estimated in the No Action condition.

### *LIBRARIES*

The analysis of libraries will include the following tasks:

- Describe and map the local libraries and catchment areas in the vicinity of the project area.
- Identify the existing user population, branch holdings and circulation. Based on this information, estimate the holdings per resident.
- Determine conditions in the future without the proposed project based on planned developments and known changes to the library system.
- Based on the population to be added by the proposed project, estimate the holdings per resident and compare conditions with the proposed project to conditions in the future without the proposed project.

If necessary, mitigation measures to avoid or reduce potential significant adverse impacts will be identified.

The CEQR Technical Manual recommends conducting a detailed analysis of library services if a proposed project would result in a 5 percent or greater increase in the ratio of residential units to libraries in the borough. In Brooklyn, the minimum number of residential units that triggers a detailed analysis is 734. Based on the residential increment of 641 dwelling units (DUs) over the No Action condition, the proposed project does not warrant a detailed assessment of libraries.

### **TASK 5: OPEN SPACE**

According to the *CEQR Technical Manual*, the project site is located in an area that is considered to be neither underserved nor well-served by open space. The proposed project would exceed both the 200-resident CEQR threshold requiring a residential open space analysis of indirect effects and the 500-worker threshold requiring a non-residential open space analysis of indirect effects. Therefore, an open space analysis will be conducted to determine whether the proposed actions would significantly affect the quantitative and qualitative measures of open space adequacy within the study area.

The open space assessment will begin with a preliminary assessment to determine the need for further analysis. No direct effects on open space are expected. If warranted, a detailed assessment will be prepared. The methodology set forth in the *CEQR Technical Manual* consists of establishing a study area for analysis, calculating the total worker and residential populations in the ¼-mile and ½-mile study areas, and creating an inventory of publicly accessible open spaces within a ¼-mile and ½-mile of the project site. The inventory may include examining these spaces for their facilities (active vs. passive use), condition, identifying open space user groups, and use (crowded or not). The analysis will assess the adequacy of existing publicly accessible open space facilities, changes in future levels of adequacy based on planned development projects in the study area, and the project's effects on open space supply and demand, based on quantified ratios and qualitative factors. If necessary, mitigation measures to avoid or reduce potential significant adverse impacts will be identified.

**TASK 6: SHADOWS**

The *CEQR Technical Manual* requires a shadows assessment for proposed actions that would result in new structures or additions to existing structures greater than 50 feet in incremental height, or of any height if the project site is adjacent to a sunlight-sensitive resource. A shadows assessment examines whether proposed structures could cast shadows on sunlight-sensitive resources, which include publicly accessible open spaces, sunlight-sensitive features of historic resources, and natural features.

The proposed project will result in new structures more than 50 feet taller than what would exist on the site in the No Action condition. Further, the project site is located ~~across Third Avenue from the Baptist Temple, a historic building with stained glass windows facing the project site;~~ across Flatbush Avenue from the Rockwell Place Garden; and directly east of the Sixteen Sycamores Playground on Schermerhorn Street. Thus, an analysis of shadows is appropriate. The shadows analysis will focus on the relation between the incremental shadows created by the proposed project's buildings ~~on~~ and any sun-sensitive landscape or activities in the open spaces ~~on~~ and sunlight-sensitive historic architectural features near the project area. These analyses will include the following tasks:

- Identify sun-sensitive landscapes and historic resources within the path of the proposed project's shadows. In coordination with a survey for the open space and historic analyses, map and describe any sun-sensitive areas. For open spaces, map active and passive recreation areas and features of the open spaces such as benches or play equipment.
- Prepare shadow diagrams for time periods when shadows from the new buildings could fall onto existing open spaces as well as open space created as a result of the project. The analysis will also take into account any historic resources identified in the area that may have significant sunlight dependent features such as stained glass windows. These diagrams will be prepared for up to four representative analysis days (the summer and winter solstices [June 21 and December 21], the spring/fall equinox [March 21/September 21], and the day halfway between the summer solstice and the equinoxes [May 6/August 6]) if shadows from the proposed building would fall onto any of the open spaces or sun-sensitive historic resources on that day.
- Map the shadows from the existing buildings, No Action buildings, and the proposed project. Describe the effect of the incremental shadows from the proposed project on publicly accessible open spaces, project open spaces, and natural features, as well as any historic resources with significant sunlight dependent features based on the shadow diagrams for each of the analysis dates.
- Create a duration table that will show the entering and exiting times when an incremental shadow will fall on each of the affected sun-sensitive features and characterize whether the extent and duration of shadows will result in significant adverse impacts.

If necessary, mitigation measures to avoid or reduce potential significant adverse impacts will be identified.

**TASK 7: HISTORIC AND CULTURAL RESOURCES**

The *CEQR Technical Manual* identifies historic resources as districts, buildings, structures, sites, and objects of historical, aesthetic, cultural, and archaeological importance. Historic resources include designated New York City Landmarks (NYCLs) and Historic Districts (NYCHDs); properties calendared for consideration as NYCLs by the Landmarks Preservation Commission

(LPC) or determined eligible for NYCL designation; properties listed on the State and National Register of Historic Places (S/NR) or formally determined eligible for S/NR listing, or properties contained within a S/NR listed or eligible district; properties recommended by the New York State Board for listing on the S/NR; and National Historic Landmarks (NHLs).

According to the *CEQR Technical Manual*, a historic and cultural resources assessment is required if a project would have the potential to affect either archaeological or architectural resources. The school buildings on Lot 1 have been determined eligible for listing on the State and National Registers of Historic Places and for New York City Landmark designation. LPC has determined that the project site is not sensitive for archaeological resources. Therefore, consistent with the *CEQR Technical Manual*, the historic and cultural resources analysis will include the following tasks:

- Within a 400-foot study area surrounding the project area, identify all known architectural resources. Conduct a field survey to identify if there are any potential architectural resources that could be affected by the proposed project. Potential architectural resources comprise properties that appear to meet the eligibility criteria for NYCL designation and/or S/NR listing. Seek determinations of eligibility from LPC for any potential architectural resources. Map and briefly describe any identified architectural resources.
- Evaluate the project's potential to result in direct, physical effects on any identified architectural resources pursuant to CEQR. Assess the proposed project's potential to result in any visual and contextual impacts on architectural resources. Potential effects will be evaluated through a comparison of the future No Action condition and the future With Action condition. The analysis will include a description of the consultation undertaken with LPC.
- If necessary, mitigation measures to avoid or reduce potential significant adverse impacts on historic or cultural resources will be identified, in consultation with LPC.

#### **TASK 8: URBAN DESIGN AND VISUAL RESOURCES**

According to the methodologies of the *CEQR Technical Manual*, if a project requires actions that would result in physical changes to a project site beyond those allowable by existing zoning and which could be observed by a pedestrian from street level, a preliminary assessment of urban design and visual resources should be prepared.

Since the proposed project requires a rezoning that would allow for additional floor area, a preliminary assessment of urban design and visual resources will be prepared as part of the EIS. The preliminary assessment will determine whether the proposed project, in comparison to the No Action condition, would create a change to the pedestrian experience that is significant enough to require greater explanation and further study. The study area for the preliminary assessment of urban design and visual resources will be consistent with that of the study area for the analysis of land use, zoning and public policy. The preliminary assessment will include a concise narrative of the existing area, the No Action condition, and the future with the proposed ~~project actions~~. The analysis will draw on information from field visits to the study area and will present photographs, zoning and floor area calculations, building heights, project drawings and site plans, and view corridor assessments.

A detailed analysis will be prepared if warranted based on the preliminary assessment. As described in the *CEQR Technical Manual*, examples of projects that may require a detailed analysis are those that would make substantial alterations to the streetscape of a neighborhood by noticeably changing the scale of buildings, potentially obstruct view corridors, or compete with

icons in the skyline. The detailed analysis would describe the urban design and visual resources of the project area and the surrounding area. The primary study area for the detailed assessment of urban design and visual resources will be consistent with that of the study area for the analysis of land use, zoning and public policy (400-foot radius surrounding the project site), where the proposed actions would be most likely to influence land use patterns and the built environment. The secondary study area for the detailed assessment will extend a ¼-mile from the boundary of the project site. For visual resources (such as the former Williamsburgh Savings Bank) and view corridors, views from more distant locations also will be considered. The analysis would describe the potential changes that could occur to urban design and visual resources in the future with the proposed project actions, in comparison to the No Action condition, focusing on the changes that could potentially adversely affect a pedestrian's experience of the area. The view corridor analysis will focus on those corridors that could experience the greatest change to the pedestrian experience, in consultation with ECF and DCP. If necessary, mitigation measures to avoid or reduce potential significant adverse impacts will be identified.

#### **TASK 9: HAZARDOUS MATERIALS**

This section will address the potential presence of hazardous materials, petroleum products and/or other environmental conditions at the project area. The EIS will summarize a Phase I Environmental Site Assessment (ESA) as well as any other available hazardous materials studies for the site. The EIS will include recommendations for subsurface testing and/or other activities that would be required either prior to or during construction and/or operation of the project, including a discussion of any necessary remedial or related measures. The EIS will include a general discussion of the health and safety measures that would be implemented during project construction to protect site workers and the surrounding community. The appropriate remediation measures specific to the proposed end use of the site will be provided in the EIS.

Block 174, Lots 1 and 13 on the project site carry an environmental (E) designation for hazardous materials. Hazardous materials (E) designations fall under the auspices of the NYC Office of Environmental Remediation (OER). Thus, the hazardous materials section of the EIS will summarize OER's requirements for this portion of the site, which the project will satisfy in order to avoid hazardous materials impacts.

#### **TASK 10: WATER AND SEWER INFRASTRUCTURE**

The *CEQR Technical Manual* outlines thresholds for analysis of a project's water demand and its generation of wastewater and stormwater. A preliminary water supply and projected water demand analysis is warranted if a project would result in an exceptionally large demand for water (greater than one million gallons), or would be located in an area that experiences low water pressure (e.g., Rockaway Peninsula or Coney Island). A preliminary wastewater and stormwater infrastructure analysis is warranted if a proposed project exceeds the thresholds outlined in Section 220, "Wastewater and Stormwater Conveyance and Treatment." These thresholds include location of the proposed project, cumulative rezonings and/or development in the project area, proposed increase in density and proposed increase in impervious surfaces. For the proposed project, an analysis of water supply is not warranted since the project would not result in a demand of more than 1 million gpd nor is it located in an area that experiences low water pressure.

An analysis of the project's effects on wastewater and stormwater infrastructure is warranted, however, since the project would exceed the *CEQR Technical Manual* threshold of 400 residential units in Brooklyn. Therefore, this chapter will include an analysis of the proposed project's

potential effects on wastewater and stormwater infrastructure. This preliminary analysis would include, among other elements, the following:

- A description of the existing wastewater and stormwater conveyance systems and the affected Red Hook Wastewater Treatment Plant (WWTP) for the latest 12-month period;
- A determination of the existing sanitary flows, the No Action sanitary flows, and sanitary flows as a result of the proposed project;
- An analysis of the effects of the incremental flows from the proposed project on the capacity of the Red Hook WWTP;
- A description of existing surface types, No Action surface types, and surface types as a result of the proposed project;
- A determination of volume and peak discharge rates of stormwater expected from the project area in the existing condition, the No Action condition, and the future with the proposed ~~project actions~~;
- Completion of the DEP flow calculations matrix; and
- An assessment of existing and future stormwater generation from the proposed project and its potential for impacts. The assessment will include a stormwater best management practice (BMP) ~~concept plan~~ conceptual discussion, which will ~~illustrate~~ identify potential opportunities to incorporate onsite stormwater source controls ~~and will also include a plan identifying potential locations of onsite stormwater source controls.~~

Based on the results of the preliminary analysis, a detailed assessment may be conducted if warranted. If necessary, mitigation measures to avoid or reduce potential significant adverse impacts will be identified.

## **TASK 11: TRANSPORTATION**

The transportation studies for the proposed project encompass five distinct analysis topics—traffic, transit, pedestrians, vehicular and pedestrian safety, and parking. The *CEQR Technical Manual* states that quantified transportation analyses may be warranted if a proposed action results in 50 or more vehicle-trips and/or 200 or more transit/pedestrian trips during a given peak hour. Based on the types and scale of incremental development that could result from the proposed project, quantified analyses of the above technical areas are expected to be warranted. In addition, an assessment of vehicular and pedestrian safety based on recent crash data will accompany the traffic and pedestrian analyses, and an off-street parking study will be conducted to inventory the area's existing supply and utilization, and assess the potential for a parking shortfall resulting from added demand generated by the proposed project.

### *TRAVEL DEMAND PROJECTIONS AND SCREENING ASSESSMENTS*

Travel demand projections will be prepared for the proposed project using standard sources, such as the *CEQR Technical Manual*, U.S. census data, approved studies, and other references. The estimates will be used to prepare the Level 1 and Level 2 screening assessments prescribed in the *CEQR Technical Manual*. As part of this effort, an inventory of the area's existing parking supply and utilization (within ¼-mile from the project site boundaries) will be undertaken to determine likely locations where project-generated auto trips would be accommodated. The projected trips (by auto/taxi, transit, or walk/bike, and deliveries, etc.) will be assigned to the area's transportation network to identify specific transportation elements that would be subject to further detailed analyses. The findings, along with relevant documentation and graphics, will then be summarized

in a Travel Demand Factors (TDF) memo for review and concurrence by the lead agency and involved expert agencies, such as the ~~New York City Department of Transportation (NYCDOT)~~ and/or New York City Transit (NYCT).

#### *TRAFFIC*

Given the scale of the proposed project as well as the proposed mix of uses, it is anticipated that a detailed analysis of traffic operations will be required for the weekday AM, midday, and PM peak periods at approximately ~~4~~16 intersections. Intersections will be determined based on the screening assessments presented in the Travel Demand Factors (TDF) memo and consultation with DOT on the review of the memo.

Following the review of the TDF memo with the relevant agencies, traffic data will be collected pursuant to *CEQR Technical Manual* guidelines to establish the existing baseline for analysis. Future conditions without the proposed project, which account for background growth, trip-making from other projects in the area, and physical/operational changes of the study area intersections, will also be determined and used as the future baseline against which potential impacts from the proposed project will be assessed. Where impacts are identified, feasible improvement measures, such as signal retiming, phasing modifications, roadway restriping, addition of turn lanes, revision of curbside regulations, turn prohibitions, and street direction changes, etc., will be explored for NYCDOT approval and implementation.

#### *TRANSIT*

The project site is served by the New York City Transit (NYCT) by 12 subway lines at six nearby stations and by 10 bus routes. Based on a preliminary travel demand analysis, bus and subway line haul analyses are not expected to be warranted. Although the transit trips would be dispersed among many subway and bus lines, the trips are expected to be heavily oriented toward the Barclays Center-Atlantic Avenue Station. It is assumed that, following the approval of the TDF memo, elements of that station will need to be analyzed. Based on the screening assessments presented in the TDF memo and in consultation with NYCT, it is anticipated that ~~the stairs on the north and south sides of entrances on Hanson Place just east of Flatbush Avenue, the passage from Hanson Place to the~~ and on the west side of 4th Avenue just south of Atlantic Avenue along with connecting stairs and fare control array, and the fare control array arrays will be required for analysis. Where impacts are identified, feasible improvement measures will be explored for NYCT approval and implementation.

#### *PEDESTRIANS*

Project-generated pedestrian trips are expected to concentrate at the project site and along primary routes to area transit facilities. Pedestrian elements at intersections near the project site and area transit facilities which incur over 200 pedestrian trips will be analyzed for the weekday peak periods, similar to the procedures described above for the traffic analysis. It is anticipated pedestrian analysis will be required at approximately ~~5~~8 sidewalks, ~~8~~10 corner reservoirs, and ~~3~~10 crosswalks. Locations will be determined based on the screening assessments presented in the TDF Memo and consultation with DOT on the review of the memo. Where impacts are identified, feasible improvement measures, such as crosswalk widening, removal/relocation of street furniture, and corner bulb-out, will be explored for NYCDOT approval and implementation.

### VEHICULAR AND PEDESTRIAN SAFETY

Crash data for the study area intersections and other nearby sensitive locations from the most recent three-year period will be obtained from the New York State Department of Transportation (NYSDOT). This data will be analyzed to determine if any of the studied locations may be classified (per CEQR criteria) as high vehicle crash or high pedestrian/bike accident locations and whether trips and changes resulting from the proposed project would adversely affect vehicular and pedestrian safety at these locations. If any high accident locations are identified, feasible improvement measures will be explored, in consultation with the lead agency and NYCDOT, to alleviate potential safety issues.

### PARKING

An off-street parking supply and utilization analysis will be performed for an area within ¼-mile of the project site. This analysis will involve an inventory of existing parking levels, projection of future No Action and With Action utilization levels, and comparison of these projections to the future anticipated parking supply to determine the potential for a parking shortfall.

### TASK 12: AIR QUALITY

~~The number of project-generated trips will likely by the proposed project would potentially exceed the 2014 CEQR Technical Manual carbon monoxide (CO) mobile source screening threshold of 170 new vehicle trips during a peak traffic hour at one or more locations within the study area. In addition, the projected number of heavy-duty trucks or equivalent vehicles will likely may exceed the applicable fine particulate matter (PM<sub>2.5</sub>) emission screening thresholds discussed in Chapter 17, Sections 210 and 311 of the CEQR Technical Manual. If screening levels are exceeded, a microscale analysis would be required at one or more intersections. Potential carbon monoxide CO and PM impacts associated with the proposed on-site parking facilities will be analyzed. Information on the design of any parking garage will be employed to determine potential off-site impacts from emissions ventilated from the enclosed portions of the garage. Following the CEQR Technical Manual, a point source screening analysis will be used to model emissions from the garage vent, assuming peak times of parking usage. Cumulative impacts from on-street sources and emissions from the parking facilities will be calculated, where appropriate. Therefore, a screening analysis will be performed to confirm whether the CO and/or PM threshold is exceeded. If screening levels are exceeded, a detailed microscale analysis would be required.~~ Predicted levels will be compared with standards and applicable *de minimis* criteria, to assess the potential for significant adverse impacts.

A stationary source air quality analysis will be undertaken to determine the potential effects of emissions from any proposed fossil fuel-fired heating, ventilation and air conditioning (HVAC) hot water systems on pollutant levels. ~~A screening The analysis will be performed to determine whether emissions from any on-site fuel-fired HVAC system equipment (e.g., boilers/hot water heaters) are significant. The screening analysis will use using the procedures outlined in EPA AERMOD dispersion model to estimate the CEQR Technical Manual. A screening analysis will also be performed to determine whether there are any potential significant adverse impacts with respect to from the 1-hour nitrogen dioxide (NO<sub>2</sub>) NAAQS heating and hot water systems for the City's PM<sub>2.5</sub>-de minimis criteria and, if fuel oil is proposed to projects. Five years of recent meteorological data, consisting of surface data from the LaGuardia Airport National Weather Service Station, and concurrent upper data from Brookhaven, New York, will be used, the 1-hour sulfur dioxide (SO<sub>2</sub>) NAAQS. A quantitative analysis will be performed if warranted based on for~~

the resultssimulation modeling. Concentrations of the screening analysisair contaminants of concern will be determined at sensitive receptor locations on the proposed project, as well as at off-site locations from the cumulative effects of the emission sources associated with the proposed project. Predicted values will be compared with national ambient air quality standards and applicable CEQR *de minimis* criteria.

The effect of emissions associated with existing or proposed large and major sources within 1,000 feet of the project site (as defined in the *CEQR Technical Manual*) will be analyzed, if required using the EPA AERMOD dispersion model.

The proposed replacement high school at the northeastern portion of the project site would include science laboratories. Therefore, an analysis will be performed to examine the expected use of potentially hazardous materials in the proposed laboratories, and the procedures and systems that would be employed in the proposed laboratories to ensure the safety of staff and the surrounding community in the event of a chemical spill in one of the proposed laboratories. Information will be reviewed on chemicals and storage quantities that would be expected at the proposed laboratory. Information on toxicity, volatility, and other relevant characteristics will be reviewed. Impacts from an accidental spill occurring in the proposed laboratory will be evaluated using the information provided and the procedures and methodologies contained in the *CEQR Technical Manual*. The procedures utilize evaporation rates developed by the Shell Development Company (M.T. Fleisher, *An Evaporation/Air Dispersion Model for Chemical Spills on Land*, December 1980), an examination of recirculation potential using the methodology described by D.J. Wilson in *A Design Procedure for Estimating Air Intake Contamination from Nearby Exhaust Vents* (ASHRAE TRANS 89, Part 2A, pp.136-152, 1983), and the determination of maximum pollutant concentrations at elevated receptors downwind of the fume exhausts using the EPA AERMOD model. Maximum concentrations will be compared with the Short-Term Exposure Levels (STELs) or ceiling levels recommended by the National Institute for Safety and Health (NIOSH) and the U.S. Occupational Safety and Health Administration (OSHA) for the chemicals examined. Where necessary, recommendations will be made to reduce any potential levels of concern.

### **TASK 13: GREENHOUSE GAS EMISSIONS AND CLIMATE CHANGE**

According to the *CEQR Technical Manual*, a greenhouse gas (GHG) consistency assessment is appropriate for projects being reviewed in an EIS that would result in development of 350,000 square feet or greater. Therefore, GHG emissions generated by the proposed project will be quantified and an assessment of consistency with the City's established GHG reduction goal will be prepared. Emissions will be estimated for the analysis year and reported as carbon dioxide equivalent (CO<sub>2</sub>e) metric tons per year. GHG emissions other than carbon dioxide (CO<sub>2</sub>) will be included if they would account for a substantial portion of overall emissions, adjusted to account for the global warming potential.

Relevant measures to reduce energy consumption and GHG emissions that could be incorporated into the proposed project will be discussed, and the potential for those measures to reduce GHG emissions from the proposed project will be assessed to the extent practicable.

The analysis will consist of the following subtasks:

- Direct Emissions—GHG emissions from on-site boilers used for heat and hot water, natural gas used for cooking, and fuel used for on-site electricity generation, if any, will be quantified. Emissions will be based on project-specific information regarding the project's expected fuel

- use or, if estimates cannot be provided, on carbon intensity factors specified in the *CEQR Technical Manual*.
- Indirect Emissions—GHG emissions from purchased electricity and/or steam generated off-site and consumed on-site during the project’s operation will be estimated. Emissions will be based on project-specific information regarding the project’s expected fuel use or, if estimates cannot be provided, on carbon intensity factors specified in the *CEQR Technical Manual*.
  - Indirect Mobile Source Emissions—GHG emissions from vehicle trips to and from the project site will be quantified using trip distances and vehicle emission factors provided in the *CEQR Technical Manual*.
  - Emissions from project construction and emissions associated with the extraction or production of construction materials will be qualitatively discussed. Opportunities for reducing GHG emissions associated with construction will be considered.
  - Design features and operational measures to reduce the proposed project’s energy use and GHG emissions will be discussed.
  - Consistency with the City’s GHG reduction goal will be assessed. While the City’s overall goal is to reduce GHG emissions by 30 percent below 2005 level by 2025, individual project consistency is evaluated based on building energy efficiency, proximity to transit, on-site renewable power and distributed generation, efforts to reduce on-road vehicle trips and/or to reduce the carbon fuel intensity or improve vehicle efficiency for project-generated vehicle trips, and other efforts to reduce the project’s carbon footprint.

#### **TASK 14: NOISE**

The *CEQR Technical Manual* requires that the noise chapter address whether the proposed project would result in a significant increase in noise levels (particularly at sensitive land uses such as residences) and what level of building attenuation is necessary to provide acceptable interior noise levels.

It is assumed that outdoor mechanical equipment would be designed to meet applicable regulations and that no detailed analysis of potential noise impacts due to outdoor mechanical equipment will be performed. Consequently, the noise analysis will examine the potential increases in noise level at nearby noise receptors resulting from traffic associated with the proposed project and the level of building attenuation necessary to meet CEQR interior noise level requirements.

Specifically, the noise analysis will include the following tasks:

- Select appropriate noise descriptors. Appropriate noise descriptors to describe the existing noise environment will be selected. The  $L_{eq}$  and  $L_{10}$  levels will be the primary noise descriptors used for the noise analysis. Other noise descriptors including the  $L_1$ ,  $L_{10}$ ,  $L_{50}$ ,  $L_{90}$ ,  $L_{min}$ , and  $L_{max}$  levels will be examined when appropriate.
- Based on the traffic studies, perform a screening analysis for each analysis year to determine whether there are any locations where there is the potential for the proposed project to result in significant noise impacts (i.e., doubling of Noise PCEs) due to project generated traffic.
- Select receptor locations for noise exposure analysis purposes. It is anticipated that four (4) receptor locations will be selected. The receptor locations will be located adjacent to the sites of the proposed development.

- At each of the receptor locations, perform 20-minute measurements at each receptor location during typical weekday AM, midday, and PM peak periods.  $L_1$ ,  $L_{10}$ ,  $L_{50}$ ,  $L_{90}$ ,  $L_{min}$ , and  $L_{max}$  values will be recorded.
- Data analysis and reduction. The results of the noise measurement program will be analyzed and tabulated.
- Determine the level of attenuation necessary to satisfy CEQR criteria. The level of building attenuation necessary to satisfy CEQR requirements is a function of exterior noise levels and will be determined. Measured values will be compared to appropriate standards and guideline levels. As necessary, recommendations regarding general noise attenuation measures needed for the proposed project to achieve compliance with standards and guideline levels will be made.

#### **TASK 15: PUBLIC HEALTH**

Public health is the organized effort of society to protect and improve the health and well-being of the population through monitoring; assessment and surveillance; health promotion; prevention of disease, injury, disorder, disability, and premature death; and reducing inequalities in health status. According to the *CEQR Technical Manual*, a public health analysis ~~is not~~ may be warranted if a project does not result in a significant unmitigated adverse impact is identified in other CEQR analysis areas, such as air quality, water quality, hazardous materials, or noise. If ~~an unmitigated~~ an unmitigated significant adverse impact is identified in the relevant technical areas of the EIS, a public health analysis will be performed: for the specific technical area.

#### **TASK 16: NEIGHBORHOOD CHARACTER**

Neighborhood character is determined by a number of factors, such as land use, urban design, visual resources, historic resources, socioeconomic conditions, traffic, and noise. Methodologies outlined in the *CEQR Technical Manual* will be used to provide an assessment of neighborhood character. The study area for an assessment of neighborhood character is typically consistent with the study areas in the relevant technical areas assessed under CEQR that contribute to the defining elements of the neighborhood. This chapter will include the following tasks:

- Based on other technical analyses, the chapter will project a description of the predominant factors that contribute to defining the character of the neighborhood surrounding the project area.
- Based on planned development projects, public policy initiatives, and planned public improvements, the chapter will provide a summary of changes that can be expected in the character of the area in the future without the proposed ~~project~~ actions.
- The chapter will provide an assessment of the proposed project's effect on neighborhood character using the other pertinent analyses (such as urban design and visual resources, historic resources, socioeconomic conditions, traffic, and noise).

#### **TASK 17: ENERGY**

An EIS is to include a discussion of the effects of a proposed action on the use and conservation of energy, if applicable and significant. In most cases, an action does not need a detailed energy assessment, but its operational energy is projected. A detailed energy assessment is limited to actions that may significantly affect the transmission or generation of energy. For other actions, in lieu of a detailed assessment, the estimated amount of energy that would be consumed annually as a result of the day-to-day operation of the buildings and uses resulting from an action is

disclosed, as recommended in the *CEQR Technical Manual*. An analysis of the anticipated additional demand from the proposed project will be provided in the EIS.

### **TASK 18: CONSTRUCTION**

Construction impacts, though temporary, can have a disruptive and noticeable effect on the adjacent community, as well as people passing through the area. Construction impacts are usually important when construction activity could affect traffic conditions, community noise patterns, air quality conditions, and mitigation of hazardous materials.

According to the *CEQR Technical Manual*, a proposed project with an overall construction period lasting longer than two years and that is near sensitive receptors (i.e., residences, open spaces, etc.) should undergo a construction impact assessment. Since the construction activities for the proposed project are anticipated to take more than two years and would near sensitive receptor locations—which may include completed and occupied portions of the project during the latter part of construction—a construction assessment would be warranted. The construction assessment will focus on areas where construction activities may pose specific environmental concerns. This assessment will describe the construction schedule and logistics, discuss anticipated on-site activities, and provide estimates of construction workers and truck deliveries.

Technical areas to be assessed include the following:

- ***Transportation Systems.*** This assessment will consider losses in lanes, sidewalks, off-street parking on the project site, and effects on other transportation services (i.e., transit and pedestrian circulation) during the construction period, and identify the increase in vehicle trips from construction workers and equipment. Issues concerning construction worker parking and truck delivery staging will also be addressed. Based on the trip projections of activities associated with peak construction for the proposed project and those from project components that would have been completed and operational during peak construction, an assessment of potential impacts during construction will be provided. If this effort identifies the need for a separate detailed analysis due to an exceedance of the *CEQR Technical Manual* quantified transportation analyses thresholds (50 or more vehicle-trips and/or 200 or more transit/pedestrian trips during a given peak hour), it would be prepared.
- ***Air Quality.*** The construction air quality impact section will contain a detailed qualitative discussion of emissions from construction equipment, worker and delivery vehicles, as well as fugitive dust emissions. The analysis will qualitatively review the projected activity and equipment in the context of intensity, duration, and location of emissions relative to nearby sensitive locations, and identify any project-specific control measures (i.e., diesel equipment reduction; clean fuel; best available tailpipe reduction technologies; utilization of equipment that meets specified emission standards; and fugitive dust control measures, etc.) required to further reduce the effects of construction and to ensure that significant impacts on air quality do not occur.
- ***Noise and Vibration.*** In the detailed construction noise analysis, existing noise levels will be determined by noise measurements performed at at-grade receptor locations. During the most representative worst-case time periods, noise levels due to construction activities at each sensitive receptor will be predicted. Based on the results of the construction noise analysis, if necessary, the feasibility, practicability, and effectiveness of implementing measures to mitigate significant construction noise impacts will be examined.

Construction activities have the potential to result in vibration levels that may result in structural or architectural damage, and/or annoyance or interference with vibration-sensitive activities. A construction vibration assessment will be performed. This assessment will determine critical distances at which various pieces of equipment may cause damage or annoyance to nearby buildings and subway lines based on the type of equipment, the building construction, and applicable vibration level criteria. Should it be necessary for certain construction equipment to be located closer to a building than its critical distance, vibration mitigation options will be proposed.

- **Other Technical Areas.** As appropriate, discuss other areas of environmental assessment for potential construction-related impacts, including but not limited to: historic and cultural resources, hazardous materials, open space, socioeconomic conditions, community facilities, and land use and neighborhood character.

#### **TASK 1819: MITIGATION MEASURES**

Where significant impacts have been identified in the analyses discussed above, measures will be described to mitigate those impacts. If the EIS identifies any significant impacts for which no mitigation can be implemented, they will be presented as unavoidable adverse impacts.

#### **TASK 1920: ALTERNATIVES**

The purpose of an alternatives analysis is to examine reasonable and practicable options that avoid or reduce project-related significant adverse impacts while achieving the goals and objectives of the proposed project. The specific alternatives to be analyzed are typically finalized as project impacts become clarified during the preparation of the EIS. A No Action Alternative, as required under SEQRA, will be considered, which in this case assumes that the existing uses would continue. If significant adverse impacts are identified in the EIS, a No Unmitigated Adverse Impacts Alternative will be included to describe the modifications to the project needed to avoid any such impacts. The analyses will be primarily qualitative. However, where a significant impact of the proposed project has been identified, it is usually appropriate to quantify the impact of the alternative so that a comparison may be meaningful. Quantification is accomplished by applying the same methodology used for assessment of the proposed project.

#### **TASK 2021: EIS SUMMARY CHAPTERS**

##### *EXECUTIVE SUMMARY*

Once the EIS technical sections have been prepared, a concise executive summary will be drafted. The executive summary will use relevant material from the body of the EIS to describe the proposed project, environmental impacts, measures to mitigate those impacts, and alternatives to the proposed project.

##### *UNAVOIDABLE ADVERSE IMPACTS*

Those impacts, if any, which could not be avoided and could not be practicably mitigated will be described in this chapter.

*GROWTH-INDUCING ASPECTS OF THE PROPOSED PROJECT*

This chapter will focus on whether the proposed project would have the potential to induce new development within the surrounding area.

*IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES*

This chapter focuses on those resources, such as energy and construction materials, that would be irretrievably committed should the proposed project be built. \*

**Appendix A**  
**Response to Comments on the Draft Scope of Work**

## **Appendix A: Response to Comments on the Draft Scope of Work**

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### **A. INTRODUCTION**

This attachment to the Final Scope of Work summarizes and responds to substantive comments received during the public comment period for the Draft Scope of Work (Draft Scope) for the Environmental Impact Statement (EIS) for the proposed 80 Flatbush Avenue project. The Environmental Assessment Form and Draft Scope of Work were issued for public review by the Educational Construction Fund (ECF) on May 24, 2017. A public meeting on the Draft Scope was held on Wednesday, June 28, 2017 at 5:30 PM at the Board of Education, 131 Livingston Street, Rooms 508A/B, Brooklyn, New York. Based on public request, the comment period was extended from Monday, July 10, 2017 to Friday, July 28, 2017.

Section B lists the organizations and individuals that provided comments relevant to the Draft Scope. Section C contains a summary of these relevant comments and a response to each. These summaries convey the substance of the comments made, but do not necessarily quote the comments verbatim. Comments are organized by subject matter and generally parallel the chapter structure of the Draft Scope. Where more than one commenter expressed similar views, those comments have been grouped and addressed together.

### **B. LIST OF ORGANIZATIONS AND INDIVIDUALS WHO COMMENTED ON THE DRAFT SCOPE**

#### **ELECTED OFFICIALS**

1. Eric L. Adams, Brooklyn Borough President, letter dated July 10, 2017
2. Velmanette Montgomery, Senator, New York State, and Jo Anne Simon, New York State Assembly, letter dated July 28, 2017

#### **COMMUNITY BOARD**

3. Shirley A. McRae, Chairperson, Brooklyn Community Board 2, letter dated July 28, 2017

#### **ORGANIZATIONS AND BUSINESSES**

4. Nancy Albilal, President, Arab American Family Support Center, oral comments delivered June 28, 2017
5. Bethany Bowyer Director of Real Estate and Planning, Downtown Brooklyn Partnership, oral comments delivered June 28, 2017
6. Peg Breen, President, The New York Landmarks Conservancy, letter dated July 6, 2017
7. Winston Hamann, Principal, Khalil Gibran International Academy, oral comments delivered June 28, 2017
8. Andrew Hoan President & CEO Brooklyn Chamber of Commerce oral comment notes submitted June 28, 2017
9. Howard Kolins, President, Boerum Hill Association, letter dated June 28, 2017 and emails dated June 29, 2017, July 25, 2017, and July 28, 2017

10. New York City Department of Education Community Education Council, District 15, letter dated July 28, 2017
11. Nat Rubin, Co-President, Atlantic Avenue Local Development Corporation, letter dated July 10, 2017
12. Molly Skardon, Co-President, YWCA of Brooklyn Tenants Association, letter dated July 28, 2017

**GENERAL PUBLIC**

13. Anita Abraham-Inz, email dated July 8, 2017
14. Spencer Adler, letter dated July 10, 2017
15. Eric Albert, email dated July 27, 2017
- 15a. Daryl Alexander, email dated July 10, 2017
16. Ann Armbruster, email dated July 11, 2017
17. Rick Aronstein, oral comments delivered June 28, 2017
18. Sandy Balboza, oral comment notes submitted June 28, 2017
19. Ivan Bart, email dated July 19, 2017
20. Hormuz Batliboi, email dated July 10, 2017
21. John Baumann, email dated July 27, 2017
22. Chris Benfante, email dated July 4, 2017
23. Lula Blackwell-Hafner, email dated July 24, 2017
24. Mark Bodie, email dated July 28, 2017
25. Ellen Bowin, email dated July 28, 2017
26. Alfred Bozzuffi, email dated July 28, 2017
27. Enid Braun, email dated July 14, 2017
28. Matthew B. Brown, email dated July 28, 2017
29. Erik Cabetas, email dated July 20, 2017
30. Yana Calou, email dated July 27, 2017
31. George Cambus, oral comments delivered June 28, 2017
32. Linda Caracciolo, email dated July 21, 2017
33. Henry Carrier, oral comment notes submitted June 28, 2017, emails dated July 10, 2017, and July 26, 2017
34. Daughtry Carstarphen, email dated July 9, 2017
35. David Chen, email dated July 28, 2017
36. Genevieve Christy, letters dated June 28, 2017 and June 29, 2017
37. Michael Coelho, email dated July 10, 2017
38. Nancy Cogen, email dated July 25, 2017
39. Charles Cohen, email dated July 10, 2017
40. Elizabeth and Gertrudis Contes, email dated July 28, 2017
41. Noah Cooper, email dated July 5, 2017
42. Paul Corell, oral comments delivered June 28, 2017 and email dated July 28, 2017
43. Sarah Crichton, email dated July 27, 2017
44. Rutul Davé, email dated July 28, 2017
45. Martha Denton, email dated July 27, 2017
46. Michael A. DuBick, email dated July 7, 2017
47. Mary Beth Early, emails dated June 25, 2017 July 2, 2017, and July 25, 2017
48. Juan P. Egui, email dated July 25, 2017
49. Kristin Eliasberg, emails dated July 10, 2017 and July 27, 2017
50. Andrea Esposito, email dated July 7, 2017

**Appendix A: Response to Comments on the Draft Scope of Work**

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51. “EW,” email dated July 7, 2017
52. Eric Farkas, email dated July 5, 2017
53. Betty Feibusch, email dated July 9, 2017
54. Britton Fisher, email dated July 28, 2017
55. Louie Fleck, email dated July 7, 2017
56. Wanda Fleck, email dated July 27, 2017
57. Grace Freedman, email dated July 27, 2017
58. Brian Floca, letter dated March 21, 2017
59. Kate Galassi, letter dated July 27, 2017
60. Jaime Garamella, email dated July 27, 2017
61. Sarah Garraoui, email dated July 10, 2017
62. Jonathan Glazer, email dated July 10, 2017
63. Edward Goldman, oral comments delivered June 28, 2017 and email dated July 26, 2017
64. Gene Golub, email dated July 20, 2017
65. Douglas Gray, email dated July 7, 2017
66. Grant Greenberg, email dated July 6, 2017
67. Robert Grimm, email dated July 10, 2017
68. Lauren Gropp Lowry, email dated July 20, 2017
69. Melissa Guion, email dated July 6, 2017
70. William L. Harris, email dated July 25, 2017
71. Claude Hersh, email dated July 10, 2017
72. Melanie Holcomb, email dated July 27, 2017
73. Susan Holman, email dated July 25, 2017
74. Phillip Hogue, email dated July 28, 2017
75. Carolyn Hughes, email dated July 28, 2017
76. Dr. Alexander P. Hughes, emails dated May 31, 2017 and July 25, 2017
77. Renee Ifill, email dated July 19, 2017
78. Sarah James, email dated July 28, 2017
79. Anand Jayachandran, email dated July 10, 2017
80. David Karp, email dated July 7, 2017
81. Barker C. Keith, email dated July 10, 2017
82. Patricia Kelley, email dated July 28, 2017
83. Jennifer Kellogg, email dated July 10, 2017
84. Angela Khermouch, email dated June 28, 2017
85. Angela Kim, email dated July 24, 2017
86. Norman Kopit, letter dated July 26, 2017
87. Roselyn Kopit, letter dated July 2, 2017
88. Marc Korashan, email dated July 27, 2017
89. Lucy Koteen, letters dated June 28, 2017 and July 29, 2017
90. Yukari Koyama, email dated July 11, 2017
91. Phillis Lehmer, emails dated July 5, 2017 and July 27, 2017
92. Mariel Liebman, email dated July 10, 2017
93. Gustavo Lovato, email dated July 10, 2017
94. Max Mandel, email dated July 27, 2017
95. Paul Marcian, email dated July 11, 2017
96. Catie Marshall, email dated July 10, 2017
97. Hannah Mason, email dated July 10, 2017
98. Martha McBrayer, email dated July 10, 2017

**ECF 80 Flatbush Avenue**

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- 98a. Laura McCallum, email dated July 28, 2017
99. Nora McCauley co-president PTA PS 261, email dated June 29, 2017
100. Kathleen McConnon, email dated July 28, 2017
101. Jackson Merchant, emails dated July 5, 2017 and July 22, 2017
102. Viviana Miller, email dated July 28, 2017
103. Zachary Model, email dated July 11, 2017
104. Anne Montero, comment sheet submitted June 28, 2017
105. Jesse Montero, email dated July 10, 2017
106. Ellen Meyers, email dated July 28, 2017
107. George Nader, email dated July 11, 2017
108. Marisa Office, email dated July 9, 2017
109. John Papp, email dated July 28, 2017
110. Robert Patrick, email dated July 25, 2017
111. Sue Patrick, email dated July 10, 2017
112. Joan Pleune, email dated July 9, 2017
113. Eleanor Preiss, email dated July 8, 2017
114. Sandy Reiburn, email dated July 12, 2017
115. Emily Reid, email dated July 29, 2017
116. Mary T. Reilly, email dated July 28, 2017
117. Ben Richardson, emails dated July 10, 2017 and July 28, 2017
118. Kellie Rogers, email dated July 27, 2017
119. Norman D. Ryan, email dated July 10, 2017
120. Karen Saah, email dated July 10, 2017
121. Cynthia Salett, letter dated June 28, 2017 and email dated July 24, 2017
122. Peter Salett, letter dated June 28, 2017 and email dated July 7, 2017
123. Briar Sauro, comment sheet submitted June 28, 2017
124. Marcia Savin, letter dated July 17, 2017
125. Paul Sawyer, oral comments delivered June 28, 2017
126. Richard Schaedle, email dated July 28, 2017
127. Kristal and Alan Seales, email dated July 28, 2017
128. Julie Sebuya, email dated July 7, 2017
129. Doug Shapiro, email dated July 28, 2017
130. Adam Shott, email dated July 10, 2017
131. Alexandra Siegel, letter dated July 7, 2017 and email dated July 10, 2017
132. Dwight Smith, email dated July 6, 2017
133. Gabriel Snyder, email dated July 10, 2017
134. Iris Spellings, email dated July 28, 2017
135. Susan Spiller, email dated July 10, 2017
136. Patricia Stegman Snyder, email dated July 28, 2017
137. Jill Stempel, email dated July 28, 2017
138. Trevor Summer, oral comments delivered June 28, 2017
139. Heather Taylor, email dated July 6, 2017
140. Meredith TenHoor, email dated July 10, 2017
141. Danny G. Thomas, email dated July 28, 2017
142. Cynthia Tindale, email dated July 10, 2017
143. Diana Toole, email dated July 29, 2017
144. Sean Toole, email dated July 29, 2017
145. Jack Tretbar, email dated July 27, 2017

- 146. Peter Vadnai, email dated July 19, 2017
- 147. Lisa Vehrenkamp, email dated July 27, 2017
- 148. Irene and Richard VanSlyke, email dated July 8, 2018
- 148a. Ditra Walsh, email dated July 28, 2018
- 149. Joan Weihe, email dated July 7, 2017
- 150. Mark Williams, email dated July 26, 2017
- 151. Sue Wolfe, oral comments delivered June 28, 2017
- 152. Karen Zebulon, email dated July 28, 2017
- 153. Matt Zimmer, email dated July 9, 2017

## **C. COMMENTS AND RESPONSES**

### **AGENCY COORDINATION AND PUBLIC INVOLVEMENT**

**Comment 1:** Many people were either not aware of the project or were unable to attend the public session on June 28. Those who were not able to attend had until July 10 to submit comments in writing. There is not enough time to fully review and respond to a scoping document of this scale. The response period should be extended. (17, 20, 42, 89, 121, 122)

**Response:** The issuance of the Draft Scope of Work and the duration of the comment period have complied with all City Environmental Quality Review (CEQR) and the State Environmental Quality Review Act (SEQRA) requirements. The Draft Scope of Work was issued for public review on May 24, 2017. A public meeting on the Draft Scope was held on June 28, 2017. In response to public comments, the comment period was extended from Monday, July 10, 2017, and remained open until Friday, July 28, 2017.

**Comment 2:** When can the community expect to receive the results of the EIS? Is the report due before the rezoning decision is made? (104)

**Response:** No final decision regarding the rezoning application will be made before the completion of the EIS. Relevant comments on the Draft Scope have been incorporated into the Final Scope, which will serve as the framework for the Draft Environmental Impact Statement (DEIS). Once ECF has determined that the DEIS is complete, a Notice of Completion will be prepared and distributed/published in accordance with applicable regulations. The DEIS will then be subject to additional public review. Applications for the proposed rezoning, zoning special permit and zoning text change will also be prepared and submitted to the New York City Department of City Planning (DCP). The draft rezoning and special permit applications and the DEIS will undergo concurrent reviews and hearings as part of the ULURP public review process. ECF will need to consider public comments on the draft rezoning application and DEIS, and a Final EIS will need to be prepared prior to the issuance of a decision on the proposal.

## PROJECT DESCRIPTION

**Comment 3:** The ECF uses tax payer funds to build schools by issuing tax-free bonds backed by the credit of the City of NY. The ECF allegedly put out a bid for developers to partner with on the project of rebuilding the Khalil Gibran High School, but there is no record of such process to be found anywhere. What transparency was provided on this public RFEI process? What was the public RFEI process? Where is the original RFEI document? When did the process occur? How were competitive bids sourced? Who were the other bidders? Who was on the review committee? What were the criteria for selecting the most qualified developer among all bidders? Who were the finalists considered and the other projects proposed? None of this appears to be outlined on the ECFs website about the project. (14, 71, 81, 90, 92, 93, 95, 103, 117, 137)

**Response:** ECF under advisement and in consultation with the NYC Department of Education, began to explore the redevelopment of the existing Khalil Gibran facility (362 Schermerhorn) in 2015. After extensive discussions with DOE, the school's principal and local stakeholders, ECF issued a Request for Expressions of Interest (RFEI) to the real estate development community soliciting interest in redeveloping the property. ECF received proposals from qualified bidders and ultimately selected Alloy based on the merits of its proposal, factoring in experience, capacity, and financial offer. Alloy is also the owner of the sites adjacent to 362 Schermerhorn.

**Comment 4:** How did ECF gain control of the building operated by the New York City Human Resources Administration? Or was the award of that property a separate transaction. If it was, who oversaw that transaction and what procedure was followed? (71)

**Response:** ECF does not control the buildings that are occupied by the New York City Human Resources Administration (HRA). HRA leases these buildings (94 and 98 Flatbush) from Alloy. Both leases expire in 2018.

**Comment 5:** Do we need another art space? How can this be needed when there is already so much? (47)

The scope should include a true assessment of community needs and priorities. The BAM area is already saturated with cultural venues. The nearby Brooklyn Museum for visual arts is underutilized. Commercial art galleries throughout New York City are closing. The scope should include assessment of the utilization of current venues. (36)

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? (12)

How will the addition of cultural space assist Boerum Hill and Downtown Brooklyn residents on a daily basis? How does additional cultural programming dovetail with the existing BAM Cultural District and recent development therein? (34)

**Response:** As the project site is located adjacent to the Brooklyn Cultural District, the proposed project could support and enhance the district’s goals by encouraging both economic and cultural development. The proposed project would introduce a new mixed-use development, including cultural community space, which would enliven the block and bring amenities to the local residents, artists, and visitors in the district.

*METHODOLOGY*

**Comment 6:** What are the specific measures that will be taken to judge impact? (57).

A project of this scale must include analysis of all 18 areas of analysis in the *City Environmental Quality Review (CEQR) Technical Manual*. (In the scoping presentation, natural resources, sanitation/sewer services, and energy are excluded). (20)

**Response:** The Draft Scope has been prepared in conformity with both SEQRA regulations and is consistent with methodologies outlined in the *CEQR Technical Manual*, an impact assessment framework developed by City agencies for use on all environmental reviews within New York City. Because the project site is fully developed and is located within a built urban area, the proposed actions would not affect natural resources and was screened out as part of the screening analysis in the Environmental Assessment Form (EAF). Task 1, “Project Description,” of the Final Scope has been revised to note that a discussion of the sanitation demands and conceptual approach to the handling and storage of the project’s projected solid waste demands will be included. As noted in Task 10 of the Draft Scope, “Water and Sewer Infrastructure,” the DEIS will assess the proposed project’s infrastructure demand. Lastly, the Final Scope has been updated to include an assessment of the proposed project’s energy demands.

**Comment 7:** The graphic materials in the proposal should accurately represent the heights of the proposed tower and the existing context (including One Hanson Place and the more recent high-rise developments along Flatbush Avenue), which they currently do not. (20, 96)

**Response:** Chapter 8, “Urban Design” of the DEIS will include up-to-date graphic representation (including building heights) of the proposed project and surrounding area.

**Comment 8:** The development of Hoyt-Schermerhorn must be included in the assessment of neighborhood and community plans. (2)

**Response:** The DEIS will address the potential impacts of the proposed project in the context of other future developments anticipated in the No Build condition.

**Comment 9:** The current study area of 400 feet is far too small. In order to truly understand the potential adverse effects of the development, the study area should be expanded. The need for the expansion of the impact radius is necessary to fully address the potential impact of land use, zoning, and public policy; shadows, wind, and glare from a nearly 1,000 foot structure. (1, 3, 12, 14, 32, 43, 48, 89, 117, 127)

Land use trends must be evaluated in their historical context, including historical buildings on Fulton Street, and the historically and architecturally significant neighborhoods of Boerum Hill and Fort Greene. (2)

The scope should analyze a larger scoping area of 2,640 feet or at least 1,320 feet to encompass new housing, traffic, and subway congestion in the area. (9)

Expand the study area from a 400-foot radius to a half-mile radius. (11, 13, 15, 16, 18, 20, 21, 24, 25, 26, 32, 36, 38, 39, 44, 49, 50, 52, 53, 57, 59, 65, 66, 69, 73, 76, 78, 82, 91, 96, 97, 100, 107, 116, 119, 120, 121, 130, 132, 133, 134, 135, 136, 139, 140, 142, 143, 144, 145, 147, 150, 153)

The analysis should encompass a larger area to be surveyed, a minimum quarter mile, but ideally one mile. (2, 14, 27, 34, 42, 49, 51, 55, 71, 79, 81, 86, 84, 87, 90, 92, 93, 95, 101, 103, 113, 117, 137)

**Response:** As discussed in the Draft Scope, the study areas to be analyzed in the EIS are determined based on guidance from the *CEQR Technical Manual* and in consultation with the reviewing agencies. The study areas vary depending on the type of technical analysis as well as the scale of the project.

The one-quarter mile primary and one-half mile secondary study areas are consistent with SEQRA practice and the *CEQR Technical Manual* for such analyses as Socioeconomic Conditions (indirect business displacement), and Open Space. The study areas for other technical assessments range between 400-feet (e.g., Land Use, Zoning, and Public Policy, Cultural Resources) to 1.5 miles (e.g., Public Child Care Facilities). Larger study areas were selected for such technical areas as shadows (over ¾-mile) and traffic (over 1.5-mile). The Urban Design analysis in the Final Scope has been modified to include long views along public corridors and were selected to recognize the presence of the surrounding neighborhoods that may potentially be affected by the project.

#### *Cumulative Impacts*

**Comment 10:** Combined with all other past, present, and future anticipated actions, the indirect and cumulative impacts must be taken into account. (1, 11, 13, 15, 18, 20, 27, 53, 57, 62, 897, 108, 121, 142)

## Appendix A: Response to Comments on the Draft Scope of Work

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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. (12)

Task 4 addresses Community Facilities and Services, and completely ignores the recent history of overall new development already placing a cumulative burden. The proposal authors seem to view the proposed project outside of this context as the proposal states repeatedly states that detailed analysis is not needed. Water, sewer, police, fire, gas and electric services, subway experience, all would need to be examined. The proposal argues that if adverse impacts are identified, measures can be identified to “mitigate” them. What about not creating the impact in the first place? (47)

Analysis of local density, traffic, school seats should include the effects of buildings that have recently opened or are under construction and will open in the next few years. All environmental effects should include these new residents with in a larger study area. These total over 7,000 units. (9)

**Response:** As stated on page 5 of the Draft Scope, the DEIS will also incorporate approved or planned development projects within the appropriate study area that are likely to be completed by the project’s 2025 completion year, as well as a general background growth for certain technical areas. As noted in response to Comment 6, Task 10 of the Draft Scope, “Water and Sewer Infrastructure” states that the DEIS will assess the proposed project’s water and sewer demand. The Final Scope has been updated to include an assessment of the proposed project’s energy demands. As described in Task 11 of the Draft Scope, “Transportation”, the DEIS would include an analysis of the proposed project’s demand on transit service. In accordance with the *CEQR Technical Manual*, detailed assessment of police or fire services would be warranted if a proposal results in the creation of a sizable new neighborhood or the direct displacement of police or fire facility; the proposed project does neither.

**Comment 11:** Figure 1 in the draft scope of work does not include 333 Schermerhorn Street, 300 Ashland Place and 15 Lafayette Avenue, which together contain over 1,200 apartments, nor does it map 590 Fulton Street, just beyond the 400-foot radius around the project. Brooklyn Community District 2 is a highly dynamic area and I encourage the Educational Construction Fund (ECF) and its consultants to take care in obtaining the most current data available. (3)

**Response:** The figures in the DEIS will include updated depictions of the recent development in the area. As noted in the Draft Scope, future baseline conditions will include other planned and approved projects.

### LAND USE, ZONING, AND PUBLIC POLICY

**Comment 12:** This analysis must include a rational assessment of the elimination of setbacks in the up-zoning request. Height and setback regulations preserving access to

daylight and sky are crucial and should not be dismissed lightly. There is no reason this project merits such a waiver. (14, 32, 39, 117, 120, 121, 127, 130, 135, 137)

**Response:** The proposed project will continue to undergo design review and modifications by ECF and DCP as part of the ULURP review process. The DEIS will provide details of the most current proposed design, including building bulk, setbacks, density, uses, arrangement, and streetscape elements.

**Comment 13:** The city needs a rational plan to build schools, not one that violates long-established zoning parameters for residential and transitional neighborhoods. A good start would be to change policy so that after a certain density is achieved, developers would be required to set aside space for schools: but only in areas that can accommodate them. (32)

Why is Alloy not offering to include schools, the ECF and cultural space in the project if they do not obtain the zoning exceptions they are requesting? (14, 63, 81, 90, 92, 93, 95, 103, 117)

**Response:** These comments are not comments on the Draft Scope. The project seeks to provide a number of community benefits without the need for city capital contribution, including two new modern schools, substantial affordable housing, and a new cultural facility. These benefits could not be achieved under the current allowable zoning district and could not be realized without the allocation of city capital.

**Comment 14:** The developer does not provide any economic justification for the 300% increase in FAR that they are requesting. (19, 36, 39, 46, 51, 71, 82, 96, 120, 130, 135)

**Response:** Economic justifications are beyond the scope of this SEQRA/CEQR analysis.

**Comment 15:** The project is described in the Draft Scope of Work with emphasis on the creation of two schools, a new public elementary school and the replacement and expansion of the Khalil Gibran International Academy, a high school. However, the proposed school construction constitutes less than 15% of the proposed development. Thus, it is far more appropriate to characterize this mixed-use, commercial, and residential development with a small element of educational space as such. (2)

**Response:** Comment noted.

**Comment 16:** The proposed FAR of 18 is far too great for the area. FAR increase request from 6 to 18 is three times what the lot is zoned for. This will allow 112 stories to be built on the site versus approximately 34. The FAR increase request from 6 to 18 is 3 times what Boerum Hill is zoned for. Note that no area of Downtown Brooklyn is even zoned above C6-4. Why would we treat Boerum Hill or Fort Greene differently for FAR exceptions? (2, 14, 33, 61, 79, 117, 146, 147)

Changing site zoning from C6-2 to C6-6 is unprecedented and unjustified. As noted above, this site is not in Downtown Brooklyn and no area of Downtown Brooklyn is zoned above C6-4. (14, 117)

This development is located in Boerum Hill not downtown; therefore; the density is excessive. (15a, 17, 21, 23, 24, 26, 28, 32, 43, 44, 45, 49, 63, 76, 78, 79, 81, 86, 89, 92, 93, 95, 100, 101, 103, 107, 108, 109, 111, 117, 123, 127, 134, 136, 143, 144, 149, 150)

The project seems rife with issues and inconsistencies with local building codes. First off, it is listed as a Downtown Brooklyn project but no part of the site is inside the borders of Downtown Brooklyn? A 112 story building would stand out in any part of NYC, but to plop it down at the corner of Flatbush and Schermerhorn seems outrageous. We do not need another mammoth scale residential development in the area, especially with tax-payer funded bonds helping finance the project.

Please stop this inappropriate project and either require developer to scale down the project to fit the neighborhood or please have the courage to terminate any and all permits. (110)

As for the proposed 80 Flatbush development site, Boerum Hill's boundaries have always included the south side of Schermerhorn Street as our northern edge, therefore we consider this triangle of land, south of Schermerhorn Street, to be part of Boerum Hill NOT part of downtown. The clash of two Brooklyns, old and new, high and low, is brought into sharp focus at this location.

The proposed plan would bring super tall buildings to the same block as our 4-story residential brownstones. An increase of the FAR to 18 is unacceptable and the community should not be unduly burdened in the trade-off for the needed benefits. To allow this would be a violation of the rights of the adjacent homeowners who have invested so much in financial and emotional capital. Please don't mistake my attempt to communicate rationally as a lack of outrage on behalf of my neighbors and my neighborhood. We have worked diligently to preserve and protect Boerum Hill. (9)

**Response:** The DEIS will assess the proposed floor area ratio (FAR), consider proximity to public transit, and will discuss how the density and form of the project relates to the densities found in the surrounding area. The proposed zoning of the project site would be consistent with the high-density C6 zoning districts found elsewhere within the Special Downtown Brooklyn District (SDBD), and would reflect the trend of higher density in the study area.

**Comment 17:** Alloy and the ECF have not provided a design of what they would build with no zoning exceptions or other allowances. (14, 81, 90, 92, 93, 95, 103, 117, 153)

For a more informed study, the EIS should include drawings and elevations of the No Action plan as well as comparison elevation of heights of buildings over 12

stories in the area. (9, 15, 21, 24, 26, 28, 47, 49, 73, 76, 78, 81, 86, 91, 116, 127, 134, 143, 144, 150)

Proposed project drawings: accurate elevations for all buildings from all directions should be included for the developer's proposal as well as for a project with a reduced FAR. (59)

**Response:** As indicated in the Draft and Final Scope, it is assumed that in the future without the proposed project (the “No Action” condition), the project site would be developed with an as-of-right mixed-use building that complies with the current zoning regulations. The square footage and uses of the No Action condition are also detailed in the Draft and Final Scope. A conceptual design of the as-of-right building will be included in the DEIS.

An as-of-right development would comply with sky-exposure-plane-based zoning. These regulations imposed on 80 Flatbush’s site geometry create a 580-foot-tall zoning envelope. The site’s existing zoning has no affordable housing requirement and no requirement to build new school or cultural facilities. Under the as-of-right scenario, the Khalil Gibran International Academy would continue operating in its existing facilities. The potential as-of-right development would include approximately 280 market-rate residential units, 50,000 square feet of retail, 130 parking spaces with two vehicular entries on State Street, and two loading berths on State Street. It would be approximately 400 feet tall.

**Comment 18:** The rezoning will negatively affect that Boerum Hill community and the surrounding narrow streets with three- and four-story buildings. (18)

How will the rezoning of this block maintain the "contextual development" that the limited height district on Schermerhorn Street maintains? How will it dovetail with the Atlantic Avenue Special sub-district? (34)

The study should consider the other streets and neighborhoods that exist in the city with this zoning. A comparison of this neighborhood to other C6-6 districts should be made to understand this addition's destruction to the rest of the neighborhood's character. The request for this zoning variance should be denied based on the proposal's out-of-scale design that does not just negatively impact and dwarf its neighbors across the street, but the entire Boerum Hill neighborhood as a whole. The zoning should remain as C6-2. (84)

While the rebuilding of a school and the addition of a new school are certainly needed, these benefits do not sufficiently justify the waiving of zoning regulations that were carefully designed and considered only relatively recently. (39, 106, 130, 135)

Task 2 of the DEIS must address the following: The precedent of too-tall, too-dense development in a neighborhood that cannot accommodate either impact and what that means for the future of zoning and public policy in New York City moving forward. (32)

## **Appendix A: Response to Comments on the Draft Scope of Work**

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**Response:** The Land Use, Zoning, and Public Policy chapter of the DEIS will discuss the rationale for the proposed rezoning actions and identify any associated impacts from the proposed project.

**Comment 19:** There is no as of right allowance for such tall building on State Street, and this plan should reflect this. (140)

This is not an as of right development—site is currently zoned as C6-2 but seeks to triple the available FAR under C6-6. What is the justification for allowing three times as much area to be built when it does not actually solve the school seat shortage for District 15? (20)

This preposterous concept deserves and should not receive more in size and scope than allowed by current zoning. That public schools might be beneficiaries of expanded volume weighs for nothing in my view. School planners have known for at least 20 years that more seats were going to be required to accommodate the growing population in public schools. (70)

The proposed project is nothing more than a thinly veiled attempt to pierce the zoning envelope that has existed adjoining Boerum Hill as a residential neighborhood. It does so by using an existing public school so that the developers can make a huge real estate coup. How many other developers could be looking at this project in other areas of the city, using public schools as a convenient tool? (31)

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. (119)

**Response:** The project seeks to provide a number of community benefits without the need for city capital contribution, including construction of two new modern schools and the provision of substantial affordable housing. These benefits could not be achieved under the current allowable zoning district and could not be realized without the allocation of city capital.

**Comment 20:** Why there is a pressing need to change existing zoning? Can't the developer find underdeveloped area where new development would be welcome news? (64)

**Response:** Given the transit-rich location, substantial demand for school seats in the community school district, and the need for housing and office space in Brooklyn, ECF has identified this as an underdeveloped site and issued an RFP to facilitate the proposed mixed use development.

### **SOCIOECONOMIC CONDITIONS**

**Comment 21:** How much in taxes will the developer not pay into the general funds that run the city over the lifetime of the lease? The developer will speak about what they are

building in the way of schools but how much are they not contributing to the City general coffers that pay for everything else we all use. This is tax money, if collected would pay for new schools and all the other needs of a city. When they don't pay the rest of the population has to cover their share of general costs from increased taxes. We need a full side by side analysis. (89)

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. (74, 89, 98a)

What the City will lose to tax credits to this developer could or should pay for improvements to the existing high school. (27)

How much taxpayer dollars will go to fund the school portion of the 80 Flatbush Project? What will the term of the tax-free bonds be? If the project goes bankrupt after issuing the bonds, who will be responsible for paying the bond-holders? In addition to paying for the school, what form of tax abatement or other benefit will be issued for the building? The community and its citizens deserve to see a complete balance sheet and financial project about how this project will use city and state tax-payer funds. Will some portion of those funds go to non-school portions of the project in an inadvertent way? The repeated statement that this project uses no city funds is not factually correct. It uses tax-payer funds, plain and simple. (14, 81, 117, 146)

Study the impact of prolonged tax abatement on the construction of future schools. Without the addition to the city tax base, how will future schools be funded? (34)

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 ongoing 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. (89)

The developer is building them for the system. How much base rent are they being paid by DOE and how much does that bring in on an annual basis, vis a vis what is needed to offset the cost of the affordable units? Obviously they will be taking advantage of the new Affordable NY tax abatement program and indicate that they will be seeking bonding authority. That is a lot of public subsidy. (96)

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Task 2 of the DEIS must address the following: How tax abatements and zoning variances are approved for projects that are not in the best interest of the communities they impact, and how tax abatements and zoning variances are approved for quasi-public projects that lack a transparent bidding process and adequate public input. (32)

Please don't allow this to happen. I do not want my taxes to pay for this. (77)

**Response:** The tax analyses requested in the comments are outside the scope of the CEQR impact assessment, and will not be provided as part of the EIS. The assessments of community facilities and other public services will be based on *CEQR Technical Manual* methodologies, as detailed in the Draft and Final Scope of Work.

**Comment 22:** The seizing of land/sites by for-profit developers as a de facto gift by the NYC Housing Preservation and Development will be protested. (114)

**Response:** As discussed in response to Comment 3, the potential redevelopment of the school site was subject to a public RFEI process. Alloy controls the adjacent parcels. The footprint of city-owned land will increase under the proposed project.

**Comment 23:** How will the developers ensure that the extensive retail spaces on the ground floor remain viable for retail in the face of multiple neighborhood retail vacancies? (16, 47)

Do we need more retail? Look around at the multitude of vacant retail sites in the neighborhood and see if you can make a case. Look around at the small luxury shops that offer nothing essential to residents. (47)

The developer should provide a market study of the additional retail square footage, particularly given the construction of thousands of square feet of prime retail space in the study area within the last 5 years. (34)

Given that many retail units adjacent to 80 Flatbush, and to the north at the new "Hub" and on the next block of Atlantic have stood vacant for over four years, can this site support 40,000 square feet more of retail space? How will 40,000 sq. ft. affect market value for existing unrented retail space? (139)

Analyze the total built SF since 2004 against the future need for commercial and market-rate retail. (34)

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? (12)

With so much other new construction in this specific area - aren't we already fulfilling our need to office space and low income housing and arts projects? (122)

The area does need new office space, and Khalil Gibran High School needs updates and repairs. Focus on these win-wins, and get out of the contentious, unwelcome, business of overcrowding public education. (99)

**Response:** The applicant believes that there will be a continuing demand for new office space in the Special Downtown Brooklyn District. The proposed project would introduce retail space which is well below the *CEQR Technical Manual* includes a 200,000-gsf threshold for assessment. The proposed retail includes a nominal amount of street level local retail that would serve to meet the needs of local residents, workers, and visitors. The proposed project is not expected to add to, or create, a retail concentration that may draw a substantial amount of sales from existing businesses within the study area to the extent that certain categories of business close and vacancies in the area increase. Based on *CEQR Technical Manual* guidelines, an assessment of potential business displacement due to retail market saturation is not warranted.

**Comment 24:** 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. (12)

**Response:** As noted in the Draft and Final Scope of Work, in accordance with *CEQR Technical Manual* methodology, the EIS analyses will account for approved or planned development projects within the appropriate study area that are likely to be completed by the analysis year.

**Comment 25:** Comprehensive neighborhood development, as touted on page 4 of your proposal, needs to address basic services such as laundromats, bodegas, small (non-luxury grocery) stores. (47)

**Response:** Comment noted.

**Comment 26:** No provision seems to be made for commercial rents or spaces for the myriad small business that need to offer services required to meet the proposed (and actual) demand the burden these many families will place on the area. (15)

**Response:** As detailed in the Draft and Final Scope of Work, the EIS will follow *CEQR Technical Manual* methodology in assessing the proposed project's demands on public amenities and services, including community facilities and services, open space, historic and cultural resources, water and sewer infrastructure, and transportation. The Socioeconomic Conditions chapter will assess the proposed project's effects on commercial rents and the potential for indirect business displacement.

**Comment 27:** The EIS needs to estimate the total number of residents generated by this project. (50, 132)

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**Response:** The EIS will include an estimate of the number of residents generated by the project.

**Comment 28:** What will happen to the value of local homes on the nearby blocks during construction and after completions of this massive project, including when these proposed new units coming to market? The shadow impacts from the new buildings will affect our property prices. (25, 34, 51, 87, 101, 138 )

Financial impacts and recommended concessions to small landlords, homeowners, and other landowners within a 1/2 mile of the project warrant a detailed assessment in the Task 3 of the DEIS. (32)

We would like this thoroughly analyzed as well as the effect on the market value of the housing on the 400 and 500 blocks of State Street, whose homes would be directly impacted by the construction of such tall towers. (2)

The scope should examine indirect residential displacement, and the effect on market value of homes on 400 & 500 blocks of State Street. (9, 51)

**Response:** A project's effects on individual property values are not within the purview of environmental review under CEQR. The purpose of the EIS is to analyze environmental impacts and to identify alternatives and mitigation measures to avoid or lessen those impacts. Since the definition of "environment" includes community character, the EIS will include an assessment of the project's potential impact on socioeconomic conditions in the neighborhood, and will assess those elements that help define neighborhood character (e.g., land use patterns, shadows, urban design, visual resources) and that may relate to quality of life concerns.

**Comment 29:** There is no need for another large development. Many apartments in already-completed new buildings are not rented. (37, 38, 98)

**Response:** Comment noted.

**Comment 30:** There is a glut of high end units in the area. 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. (89)

**Response:** The requested market analysis is outside the scope of a CEQR impact assessment.

**Comment 31:** When this project goes up in whatever form it goes up in, the developers should work hard to make sure that the local business community is involved. And when I say that I mean the local construction, the local trades, the local people who are electricians, the drywall experts—all of that. They are involved in this building.

Because if it's going to be in Brooklyn, let's try to keep the money in Brooklyn at least. (125)

**Response:** Comment noted.

**Comment 32:** What exactly are the new employment opportunities that this development will bring? Will the positions be living wage? (34)

**Response:** Estimating the specific types of tenants and wages would be speculative and is beyond the scope of a CEQR assessment.

**Comment 33:** I feel that this development needs to be tailored to provide an economically viable benefit to the neighborhood. (54, 39)

While I am a strong proponent of public education and affordable housing oversized rampant development is a bad solution with too many negative consequences. (106)

Whilst I support the creation of affordable housing units and adding school seats to the district, this development does not add sufficient benefit to the neighborhood for its scale. (66)

**Response:** Comments noted.

**Comment 34:** Does indirect residential displacement cause indirect business displacement of business who support those displaced groups? (11)

**Response:** The preliminary assessment of indirect business displacement will examine whether the proposed project would directly or indirectly displace residents, workers, or visitors who form the customer base of existing businesses in this area.

#### *AFFORDABLE HOUSING*

**Comment 35:** While we anticipate that the EIS will assert consistency with current public policies to increase availability of housing stock as justification for the enormity of the project, we are concerned that New York City will not be able to build its way out of a housing crisis with luxury projects that include a small number of subsidized units themselves priced at rents higher than neighborhood median incomes can afford. Our experience in Brooklyn is that such projects only increase pressure on rents, displacing people who can't even qualify to enter lotteries for the new, supposedly "affordable" housing. There is nothing about the proposed project at 80 Flatbush that alters our concerns in this regard. (2)

**Response:** Comment noted.

**Comment 36:** Step 3 [in task 3 *socioeconomic conditions* in the draft scope] comes into consideration when Step 2 [in task 3 *socioeconomic conditions* in the draft scope] discloses that the study area has already experienced a readily observable trend

toward increasing rents. Step 3 would then seek to disclose the likely effect of the action on such a trend. For Step 3, it is appropriate for study area characteristics to include estimates of the number of housing units governed by rent protection measures that are in buildings with significant unused residential floor area. Step 3 should also then identify the number of housing units with a gap between the rent pursuant to a lease and the legally permitted regulatory rent. Such underdeveloped property often is referred to as a "soft site." In this context, a soft site is a property deemed to be attractive enough as a development site based on the extent of the built floor area in comparison to the permitted floor area. Additionally, a property may be considered a soft site if it contains residential units with a significant gap between charged rent and the legally permitted regulatory rent.

In addition, such rent-stabilized apartments might include tenants who pay legally permitted regulatory rents (preferential rents). This results in a substantial gap between tenants' expiring leases and allowable rents that might be sought by landlords as part of a lease renewal, according to the legally permitted amount. Such significant increase in rents would increase rent burden and might result in residential displacement. (1)

Therefore, documentation of underdeveloped rent-stabilized buildings, as well as rent-stabilized buildings where gaps exist between rents pursuant to a lease and legally permitted regulatory rents, should be accounted for in developing assumptions for the possibilities of induced indirect displacement should the outcome of Step 2 lead to implementation of Step 3. (1, 3)

**Response:** The requested analyses regarding the number of housing units governed by rent protection measures that are in buildings with significant unused residential floor area, and the number of housing units with a gap between the rent pursuant to a lease and the legally permitted regulatory rent, are not consistent with *CEQR Technical Manual* guidelines for an assessment of indirect residential displacement, and will not be included in the EIS.

Based on *CEQR Technical Manual* guidelines, population, income, and rental trend data are utilized in order to determine whether a project could potentially introduce a trend or accelerate a trend of changing socioeconomic conditions. If the preliminary assessment cannot rule out the potential for significant adverse impacts, a detailed analysis is conducted. The detailed analysis, if determined to be needed, will utilize *CEQR Technical Manual* guidelines and lead agency guidance to estimate the population potentially vulnerable to indirect displacement due to increased rents, and whether the proposed project could displace the identified vulnerable population to the extent that the socioeconomic character of the neighborhood would change. If the EIS analysis identifies a significant adverse impact due to indirect residential displacement, mitigation measures could include: providing appropriate, comparable space as part of the project, either on-site or off-site but within a reasonable distance of the current

location of the units that would be displaced; or creating new rent-regulated units through programs such as inclusionary housing, preservation of existing rent-stabilized units, or the development of new publicly assisted units within the study area.

**Comment 37:** We are concerned that the proposed building will further displace the African American community in the area, which has already suffered significant displacement. (2)

In regard to the fabric of the neighborhood it is important to look at how the Socioeconomic Conditions work together. How do rising rents across a half-mile scoping area cause indirect residential displacement not only based on income brackets. Does the scoping study also look at the effect on racial and ethnic groups? And in turn, does that indirect residential displacement cause indirect business displacement of business who support those displaced groups? Furthermore, shouldn't there be affordable housing in Phase 1 of the project to more quickly address displacement? (11)

**Response:** As reflected in the Draft Scope of Work, the DEIS will include a study of the potential for indirect residential displacement. The requested analyses regarding market values, race and ethnicity are not consistent with *CEQR Technical Manual* guidelines for an assessment of indirect residential displacement, and will not be included in the EIS.

**Comment 38:** It appears that the proposed housing mix is 80/20, however, given the housing price pressure on middle and low income families, this strikes me as unbalanced. I would suggest the committee adopt a 50/30/20 approach. We need housing for the working- and middle-class. (60, 124)

Twenty percent so-called affordable (a) does not necessary mean truly affordable (b) it means that there is 80 percent unaffordable. All the students at the high school will not be able to afford to live anywhere near the school if they do now because the neighborhood will be increasingly priced out. There are New York City Housing Authority houses in either direction—five, six blocks away. None of the people in those housing projects would be able to afford to live in this building including, no doubt, the affordable housing. Last point is to suggestion that of the 20 percent so-called affordable, few if any will be large enough for families that require two or three bedrooms to live in. If the affordable apartments are studios and one-bedroom apartments, then they will not adequately support the needs of the people who have traditionally lived in this community. (63, 63) The area is already overwhelmed with people and has become unaffordable for the long-time residents. (94)

**Response:** Comment noted.

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**Comment 39:** With a potential oversupply of rental units in the area, some of the Phase I tower should include affordable housing. (9, 11)

**Response:** Comment noted.

**Comment 40:** How does the need for premium luxury office space compare with the need for permanent affordable housing? (34)

**Response:** This is not a comment on the Draft Scope of Work.

**Comment 41:** How will the city ensure that the affordable housing remains affordable? What standards are in place to define affordable? What rules are in place to hold developers to their affordable housing promises even if the rental market goes south? (16)

**Response:** The proposed project includes a rezoning to designate the project area as a Mandatory Inclusionary Housing (MIH) area, which will require a share of new housing to be permanently affordable. The MIH program establishes permanent affordability for the site and specifies compliance with MIH requirements, such as asking rents for affordable units; building plans; zoning calculations showing affordable floor area; and unit size, distribution, and bedroom mix of the affordable units. The application would designate an administering agent pre-qualified by HPD to monitor compliance of the rental of affordable units.

**Comment 42:** How will the MIH ratio and distribution requirements be modified? What percentage of MIH units will actually be affordable (defined as 20% of AMI)? (34)

**Response:** The application includes a requirement that 20% of the project's residential floor area be affordable at an average AMI of 60%; Phase 1 would not include an affordable component; approximately 28% of Phase 2 would be affordable. The specific AMI tiers that average 60% AMI have not yet been determined.

**Comment 43:** 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. (12)

This neighborhood [Boerum Hill] and adjacent brownstone neighborhoods are already suffering from the new additions of inappropriate gigantic towers that cast shadows on the neighboring homes and backyards. These luxury apartments do not offer housing to middle-income families who are being displaced and driven out. We have steadily been losing the mom-and-pop shops that provide basic services. Much of the appeal of Boerum Hill is the rows of two- and three-family homes where middle-income people can raise families in quiet leafy surroundings. (124)

**Comment 44:** Comment noted. As detailed in the Draft Scope of Work, the Socioeconomic Conditions chapter of the EIS will include an assessment of potential indirect business displacement. The indirect residential displacement assessment will include analysis of changes in demographics and rents. The indirect business displacement assessment will consider effects on neighborhood-serving commercial uses. Additionally, project-generated shadows would fall to the west in the morning, to the north in mid-day, and to the east in the afternoon, moving continuously over the course of each day. It is also important to note that should a recession, housing glut, or downturn in the real estate market occur in the next several years—a likely scenario, in fact—the affordable housing may never be built. How will the financial models for the project, including tax abatements, accommodate this possibility? (32)

**Response:** Economic analysis is outside the scope of CEQR analyses.

**Comment 45:** This neighborhood simply does not have the infrastructure to accommodate such colossal residential towers. We do not have the grocery stores, restaurants, gyms, pharmacies needed to continue to make this neighborhood habitable. (98)

**Response:** Comment noted.

#### COMMUNITY FACILITIES AND SERVICES

**Comment 46:** For the headache and hassle of enduring the construction as well as altering the community, give the block free access to all the amenities in the proposed development, including playground access, gym access, etc. (127)

**Response:** Comment noted.

**Comment 47:** The description of each publicly funded group child care facility pertaining to existing child care centers should note whether the location is City-owned or leased (including the number of years remaining on the lease), the year, and extent of capital improvements, as well as available floor area. (1)

In addition to location, capacity (number of "slots"), and existing enrollment [of publicly funded child-care facilities], please note whether or not each facility is City-owned or -leased and in the latter case, provide the date when the lease will expire. (3)

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**Response:** The Community Facilities analysis in the EIS will follow 2014 *CEQR Technical Manual* methodology. Potential impacts on publicly funded child care facilities will be analyzed in the EIS based on New York City Administration for Children's Services (ACS) data received from DCP, which includes location, enrollment, capacity, and utilization.

**Comment 48:** The scope should assess capacity of all existing city infrastructure to support needs of new residents and workers including but not limited to hospitals and police. Please note also that the police department and EMT services are frequently called to the YWCA. (36, 12)

**Response:** As explained in the Draft Scope of Work, per *CEQR Technical Manual* guidance, a detailed assessment of health care facilities is included only if a proposed project would directly affect the physical operations of, or access to and from, a hospital or public health clinic, or if a proposed action would create a sizeable new neighborhood where none existed before. The proposed project would be located within the existing Downtown Brooklyn neighborhood, which is a neighborhood currently served by police and fire protection services.

**Comment 49:** Has the post office been notified of the proposed addition of 900 plus units in our zip code? (139)

The neighborhood of the proposed development (Zip Code 11217) lacks a full-service Post Office. The current strain on the postal system is reflected in a preponderance of postal deliveries to residences occurring after 5 PM.

An analysis of impacts on the United States Postal Service in the 11217 Zip Code must be included in Task 4 of the DEIS document. (32)

Currently the mail service is inadequate in the neighborhood. We don't get mail every day and many packages are lost. How will the new families and offices be accounted for by the post office? (53)

**Response:** The Community Facilities analysis in the EIS will follow 2014 *CEQR Technical Manual* methodology. The *CEQR Technical Manual* defines community facilities as public or publicly funded schools, child care centers, libraries, health care facilities, and fire and police protection services.

**Comment 50:** I note that most books and other material now "float" within the Brooklyn library system and no longer have a 'home branch' to which they are returned. Therefore, holdings per resident may not be the best measurement of existing conditions or the impact of the proposed project. Total number of seats, current seated occupancy rate at peak periods and projected change in demand may better express the impact of the project on the local libraries.

I also note that the Brooklyn Public Library (BPL) plans to open a facility within the so-called "cultural condominium" at 300 Ashland Place. The new space may not appear on some inventories of BPL branches. (3)

**Response:** The Community Facilities analysis in the EIS will follow 2014 *CEQR Technical Manual* methodology. Potential impacts on public libraries will be analyzed in the EIS based on data received from DCP. Per *CEQR Technical Manual* methodology, an analysis of libraries compares the population generated by a proposed project with the study area population.

**Comment 51:** Where will the substance abuse treatment facility be relocated? (12)

**Response:** The above-referenced treatment facility has relocated and is no longer at this location.

**Comment 52:** Task 17 of the scope must fully address the adequacy of the local police force to monitor construction labors engaged in illicit activity as well as the ability of the construction industry to self-police its workforce. (32)

**Response:** The *CEQR Technical Manual* recommends conducting analyses of police services in cases where a proposed project could affect the physical operations of, or direct access to and from, a precinct house, or where a proposed project would result in the creation of a sizeable new neighborhood where none existed before. The proposed project would not affect the physical operations of or direct access from a precinct house and would not result in the creation of a sizeable new neighborhood where none existed before. Furthermore, police enforcement of any potential illicit activity is not within the scope of this CEQR analysis.

#### *FIRE PROTECTION*

**Comment 53:** We ask that the effects of the proposed project on the firehouse on State Street, Engine 226, be analyzed. (2, 3, 32, 53, 65, 86, 101, 142, 145, 153)

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? (14, 37, 51, 53, 87, 113, 117, 121, 145)

Compare the current response time of Fire Engine 226 with the response time now, during construction, and then after build completion, especially including times when school buses are lined up in the morning and afternoon on State St. (16, 32, 34, 69, 139)

What will be the effect on response time of Engine 226 after completion, considering the additional 900 units in 80 Flatbush, as well as an estimated 6000 new and anticipated units on surrounding blocks? (16)

The proposed action would directly affect the physical operations of, and access from, Engine Company 226 on State Street, and would create a sizeable new, ultra-high-rise residential neighborhood—20 stories higher than nearby developments (including the Hub, 300 Ashland, etc.), requiring specialized fire-fighting equipment and training—where none was necessary before. Engine

Company 226 is not equipped to handle super-high-rise fire emergencies in terms of equipment or staff size. Response times and service availability from the Tillary Street Fire Station and any other more robust stations proximate to the site must be assessed. (32)

How will fire trucks be able to turn if needed? What streets will they drive down? How much extra time will this take? (53)

**Response:** The *CEQR Technical Manual* recommends conducting analyses of police and fire protection services in cases where a proposed project could affect the physical operations of, or direct access to and from, a precinct house or fire station, or where a proposed project would result in the creation of a sizeable new neighborhood where none existed before. The proposed project would not affect the physical operations of or direct access from a precinct house or fire station, and would not result in the creation of a sizeable new neighborhood where none existed before. FDNY does not allocate personnel based on proposed or potential development. FDNY would continue to evaluate the need for personnel, equipment, or locations of facilities and make necessary adjustments to adequately serve the area.

#### *SCHOOLS*

**Comment 54:** The [CEQR] analysis [on the project's effects on community public schools] should be expanded to include the entire zone of properties districted for The Pacific School Public School 38 toward identifying other projects expected to be built that would be completed before or concurrent with the project that would impact future utilization of the school. (1)

**Response:** The Community Facilities analyses in the EIS will follow 2014 *CEQR Technical Manual* methodology. In accordance with the CEQR methodology, the study area for the analysis of public elementary and intermediate schools is the school districts' sub-district in which the project is located. Future conditions will be predicted based on SCA enrollment projections and data obtained from SCA's Capital Planning Division on the number of new housing units and students expected at the sub-district level.

**Comment 55:** The City should not be shunting its responsibility to create new schools as the population grows, off to private developers whose motivation is, after all, profit, not altruism. (89)

Letting private developers decide on where and when schools are built should not be the City's policy for this important public institution. (18)

I would love to hear why there is a need for a sky scraper with the construction of a school? Let's spend more resources on building the best school in Brooklyn and fewer resources on another 300 Ashland. (41)

Why does the project need to be funded by taxpayers money? This is a purely commercial enterprise so business should fund itself. Use of public money to enrich business is qualified as fraud.

Taxpayers' money should be used directly to the cause it was originally meant—schools—not to help the developer to build towers. (64)

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. (12)

We all want the school. We all want to side with that principle, but it's falsely assigned with a gigantic tower that actually creates net negative schooling and school seating. It's just the wrong thing. I ask the Department of Education to actually build the school outside of this. Double the size of the school, half the size of the tower. (138)

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. (89)

The DOE and the SCA obviously exist to build school facilities. If the amount of tax payer funds that will be used to provide tax breaks for the bonds and other abatements to support the project were simply applied to building a new school directly, what would that project look like? The city could very likely build a comparable or better set of schools with the same or less than will be used for this ECF version of the project. Also, giving up the rights to the land and air rights for 99 years is an extremely high price to pay to "not use any city funds." (117)

The precedent set by this project is a dangerous one: with the promise of new schools and affordable housing, developers will be rewarded with maximum zoning accommodations in otherwise completely inappropriate locations, and in return, profit handsomely. However, this particular scenario is based on flawed assumptions, creative statistics, and an RFEI process hidden from public view.

Since its founding, the New York City School Construction Authority (SCA) has been tremendously effective in planning and executing its capital improvement and capacity initiatives. There is no reason to believe that with deep community collaborations, it cannot be as successful in developing strategies to find real estate, even in this most difficult market. (32)

The key to the financing is that the ECF, as I understand it, owns the air rights above all public buildings and are chartered to work with developers to devise

public/private projects. But we should all remember that these air rights are public property and should not be ceded solely to line the pockets of private developers.

The SCA, which accesses the city's School Construction Capital budget, habitually comes to public meetings saying that they cannot find suitable sites for new schools and in turn, pushes budgeted capital funds forward into the next year. This way, while the budget shows funding, they never get around to fully spending it. The ECF is a way to avoid spending down the SCA budget. (33)

**Response:** These are not comments on the Draft Scope of Work.

**Comment 56:** My understanding of the ECF, while limited, is that this is an organization put in place to address the real needs New Yorkers have for additional school seats. I believe this organization to be very valuable. But, this project, 80 Flatbush will not meet this goal. The addition of a 350 seat elementary school is not an adequate tradeoff for the increase in children a 900 unit project will cause. I request that an additional study be conducted to determine exactly how many more children will be added to Boerum Hill as a result of these proposed 900 units. This way we all have a real picture of the effect on neighboring schools this project will have. (121)

The financing for the proposed two schools is coming from public funds; the DOE/SCA can build a new High School to replace Khalil Gibran High School without the assistance of a developer. They could also purchase other parcels in the area to build the primary school. School construction does not require residential development that is out of proportion to the existing landscape of the community. (33)

The city has the budget to build 2,249 seats yet instead is turning to a state funding authority to build 700 seats (350 new/350 replacement) while providing tax free financing for a completely out-of-proportion development that will add to student overcrowding. (33)

How many school age children will result from 900 units of housing? How will the city address the current seating deficit? (16, 50, 39, 47, 69, 87, 86, 91, 97, 101, 108, 121, 123, 132, 136, 145, 148, 147)

School needs of existing residents must be met before thousands of new residents are added to the community. The proposal will absorb the current 300 Khalil Gibran students and add another 300-400 slots which would likely be filled by new residents in the new construction. This does little, perhaps nothing, to solve the current, urgent school need and the proposal should not be marketed as such. (36)

Comparing the "with action" to "no action" scenarios in table 1 of EIS Scoping, the number of school-age children will increase by building three times as much residential GSF, and will negatively impact the available school seats when

adjusting for the fact that half of the school GSF is simply replacing an existing school. How has this impact been considered? (20)

**Response:** The Community Facilities analyses in the EIS will follow 2014 *CEQR Technical Manual* methodology. The size of the new student population resulting from the proposed project will be analyzed in the assessment of public schools.

**Comment 57:** Could the EIS also be expanded to consider school seats in the entire district? It is shocking to me that city-owned land that is so highly valued will yield us so few new seats given all the development that has occurred in Downtown Brooklyn. Khalil Gibran urgently needs better facilities, but the building in which it is located is so valuable that it should be possible to get more seats from expanded development. I think the EIS needs to take the potential availability of new school sites into consideration, as well. What is the impact of getting so few seats on one of the few developable parcels of land in the district? (140)

**Response:** The Community Facilities analyses in the EIS will follow 2014 *CEQR Technical Manual* methodology. According to *CEQR Technical Manual*, the study area for the analysis of elementary and intermediate schools is the school districts' "sub-district" (also known as "regions" or "school planning zones") in which the project is located.

**Comment 58:** 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. (89)

**Response:** Comment noted.

**Comment 59:** No one doubts that the Khalil Gibran International Academy is in desperate need of renovation and that a new primary school is needed to accommodate the already burgeoning population in the area; however, with the additional housing proposed at this site, the current overcrowding in classrooms will continue to be an issue, so much so that the net result would be negative and thus the claimed public benefit is illusory. (2, 32)

By NYC DOE math, the school aspect of the project will contribute to local overcrowding, not alleviate it. (14, 63, 117)

We are extremely concerned about the issue of school overcrowding in this area. While the Draft Scope cites to statistics for District 15, the site is virtually surrounded by District 13 which has school overcrowding issues as well. The rapid pace of residential development in and around Downtown Brooklyn has only exacerbated this problem with no relief in sight. Each attempt to build school space into a massive residential development furthers the area's shortage of school seats. This proposal is no different. It proposes to add 922 new residential units, which will add an estimated 510 new public school students using the

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Department of Education's own formula. The 370 new school seats that 80 Flatbush is offering leaves a net negative of 140 school seats in an area where residents are facing overcrowding in their public schools already. It appears that at least 140 additional school seats are required to support the students projected from 80 Flatbush alone. This does nothing to address the current shortage, but would leave hundreds more students high and dry. (2, 137)

In regard to schools, a new elementary school and the renovation of Khalil Gibran International Academy are, of course, welcome. However, with addition of the Hub, The Ashland, and Caesura, there are 1,800+ new apartments just within the 400 foot scoping area! What about all the other additional new development within the district? What is the realistic outlook for elementary and middle school resources? How will it affect current residents, and the success of the new developments. What is the city's plan without 80 Flatbush? Should we expect a 75-story tower for each new elementary school in Brooklyn? (11)

The current proposal will not alleviate, but likely exacerbate, both the current student overcrowding issue and the school equity issue in District 15. ECF's project utilizes an outdated formula to determine primary school seats and doesn't weigh middle school impact. The project's completion date of 2021 increases the likelihood that this multiplier will be more inadequate and the likelihood that all the new primary school seats at 80 Flatbush will be used by the residents of the development. Though the project designates some affordable units, given current zoning tendencies, creating a school utilized primarily by one block of residents exacerbates the equity issue CEC 15 is committed to solve. CEC 15 proposes ECF and Alloy provide 750 to 1,000 primary school seats to truly address district overcrowding and integration. CEC 15 encourages ECF and NYC School Construction Authority to renovate Khalil Gibran International Academy and utilize the remaining property at the site to materially increase the number of seats available to all children in District 15, fully accounting for the increased demand anticipated from all area residential development. The current proposal fails to do that. (10, 15, 33, 114, 134)

Under the DOE formula, 55 students are projected for every 100 new residential units. The formula assumes, on average, that 45% of new residential units will not have any school age children as residents and the remaining seats will only have one child. Most people would consider this formula to be very inadequate. Nevertheless, if we use this formula, the 922 residential units at 80 Flatbush, will produce 507 new students. Alloy is promising to build 700 seats of which 350 are a replacement of existing seats at the Khalil Gibran high school. That leaves 350 new seats for a (in my opinion too small) new primary school. (33)

In fact, the primary benefit which the developer touts will not actually do much to improve school overcrowding. The 922 additional residential units proposed in by the development at 80 Flatbush could add as many as 510 students to the

district. The current proposal only adds 370 seats leaving a net negative. (19, 32, 74, 81, 90, 92, 93, 95, 103, 116)

The 80 Flatbush project adds only 350 new seats to the District 15 capacity while adding 507 new students to the district. Even by the grossly underestimated DOE formula, the Alloy project falls short and will only exasperate the overcrowding issue. (33)

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? (119)

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. (89)

The plan put forward by Alloy, as I understand it, can be “expanded” by them to include additional seats for schoolchildren in the same building site, probably involving an add-on elementary school to the premises. But would that be of benefit, considering that Alloy’s plan is to increase population density in our neighborhood by increasing the height of its building project and thereby taking up some if not most of the classroom seats to be added? (42)

Although the plan under review would provide much needed benefits to the Khalil Gibran High School, it exacerbates an already significant problem plaguing elementary and middle schools in School District 15 which, according to available statistics, has a total need of 2192 classroom seats with fully 912 unfunded at this time. The proposal to build classroom space to accommodate 350 or so students, while appearing to mitigate the problem, will in fact only make it worse, because the large residential towers, comprising 900 units, would conservatively add 495 school age children to the district according to New York City Planning Commission guidelines. Simple arithmetic shows a negative impact on classroom space arising from the 80 Flatbush project. (17, 46, 51)

The project should include a detail analysis of the impact on school capacity, specifically whether the additional school slots will alleviate current

overcrowding or whether new residents will add more students than the number of new slots being built. (59)

**Response:** Based on 2014 *CEQR Technical Manual* methodology, the Community Facilities analysis in the DEIS will provide a detailed evaluation of the potential impact of students generated by the Proposed Project on public schools. If potential significant adverse impacts are identified, the DEIS will advance proposed measures to mitigate those impacts.

**Comment 60:** Why does the proposal highlight the shortage of seats in PS 29 and PS 58, while other schools in the District have seats available? PS 38 is an example. (32, 47)

The SCA is planning school construction in these Districts, including the 436-seat annex that will replace the trailers at PS32, the new 180-seat pre-k facility on Ninth Street and Third Avenue, and others. How have these statistics been melded into the formula to determine overall seat needs? (32)

How will the proposed additional elementary school seats dovetail with the 500 new seats at PS32K and the open seats currently available at PS38? There are more public elementary schools in District 15 than PS58 and PS29. (34)

We request that the EIS analyze the area construction over the next five years (as mentioned in Task 2 of the Draft Scope of Work). There are 4,000 new units of housing under or near construction in the area and another 2,000 in the pipeline. A thorough and dispassionate analysis is needed and will help gauge the number of school seats that are actually needed and could potentially modify the plans for the two schools. (2)

The scope should examine enrollment and capacity issues should include the 4,000 to 6,000 units of housing coming on line or to be constructed in the next 3 to 5 years. (9)

With the addition of the total number of school children generated by the project, will the number of unfunded seats increase or decrease? Decrease means in the context of this project that the number of school seats built by Alloy will reduce overcapacity in CSD 15 and the total number of unfunded seats in the district after it has absorbed the new students created by the project. If it will reduce overcapacity, then by what number of seats? (13, 50, 132)

Will this proposal yield a net increase or decrease in the number of school seats currently needed either funded or unfunded? The size of the school seems very small in regard to the need, especially with a growing school population in District 15. (49, 57)

Alloy's plan will only exacerbate the overcrowding of schools. The addition of 922 new residential units will add 510 new students. Adding 370 new seats is a net negative. This number is significant. This will not attract young families to

the neighborhood and it will also prevent young families like ours from establishing roots. (85)

The 922 proposed residential units of 80 Flatbush will bring 507 new students.

The new 350-seat elementary school will be a net negative of 157 seats (the new Khalil Gibran H.S. is just a replacement for existing seats). (14)

It sounds like the proposed 350 seats are not a net gain for the district, but rather seats for the development. (53)

**Response:** See response to Comment 54. In accordance with the *CEQR Technical Manual*, this analysis will use the most recent DOE data on school capacity, enrollment, and utilization rates for elementary and intermediate schools in the sub-district study area. Future conditions will be predicted based on SCA enrollment projections and data obtained from SCA’s Capital Planning Division on the number of new housing units and students expected at the sub-district level.

**Comment 61:** How will children residing in the proposed project be zoned for elementary schools? (47)

**Response:** This is not a comment on the Draft Scope of Work.

**Comment 62:** The DEIS should provide capacity, enrollment and utilization data for all elementary schools in Community School District 15; a map of the zones for all primary schools in the vicinity of the proposed project; and a list of all other residential development projects that may create demand for the schools in the vicinity of the project. (3)

**Response:** The Community Facilities analyses in the EIS will follow 2014 *CEQR Technical Manual* methodology. According to *CEQR Technical Manual*, the study area for the analysis of elementary and intermediate schools is the school districts’ “sub-district” (also known as “regions” or “school planning zones”) in which the project is located. Public elementary and intermediate schools within this study area will be mapped. Future conditions will be predicted based on SCA enrollment projections and data obtained from SCA’s Capital Planning Division on the number of new housing units and students expected at the sub-district level.

**Comment 63:** The neighborhood schools are at capacity. There are many buildings in the area already currently under construction that, when they are occupied, will bring the schools over capacity like all the other schools in District 15 (other than the ones in Red Hook).

Before allowing more residential development that affects the schools, the city and DOE really need to play catch up with the overcrowding situation they already have.

Typical schools in the district are built for 800 students. Many are at 120% capacity—which for an 800-seat school means it is hosting 1000 students.

The school offered in this proposal is for around 350 new seats. That is less than half the size of the nearby schools, and will do nothing to alleviate overcrowding in the area unless possibly the buildings themselves contain no residential units.

If the buildings contain 900 residential units as proposed, in this particular moment in time when Brooklyn is a magnet for young families, 900 units will assuredly result in at least 500 children in the building—more than the seats being offered. (99)

The proposed project will add to the issues of school overcrowding and student safety concerns. Flatbush, one of the main arteries to the rest of Brooklyn will become clogged and unusable—as well as unsafe for everyone. (77)

I strongly oppose the size of the 80 Flatbush project as it will immediately outbalance the local schools. My understanding is that for 112 stories about 500 students will be added to the local school system and the school in the building wouldn't even be able to handle that many. (29)

Our community, Boerum Hill, cannot support this huge development in terms of increased school enrollment. (75)

The failure of responsibility by the city to provide increased schools for the increased density that the Mayor's one-size-fits-all thoughtless rezoning enables will be protested and fought against...tooth and nail. (114)

**Response:** Based on 2014 *CEQR Technical Manual* methodology, the Community Facilities analysis in the DEIS will provide a detailed evaluation of public schools in the sub-district, including existing conditions and utilization as well as the potential impact of students generated by the proposed project on public schools. If potential significant adverse impacts are identified, the DEIS will advance proposed measures to mitigate those impacts.

**Comment 64:** 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. (12)

**Response:** Comment noted.

**Comment 65:** How will the Khalil Gibran International Academy retain its identity and mission to serve the immigrant population? What will happen when non-immigrant applicants apply as first choice for seats in the new modern high school? Who will be given preference and how will this be justified? (47)

**Response:** This is not a comment on the Draft Scope of Work.

**Comment 66:** High school principals are under pressure to produce results under a variety of "metrics" focused on academic achievement, graduation rates, college acceptance, etc. Even if the current principal stands firm, he cannot legitimately

favor applicants by country of origin. How can Khalil Gibran International Academy prevent the situation that has happened all over Manhattan, in which the cohort of each successive class has become more aspirational, more white, more privileged? (47)

**Response:** This is not a comment on the Draft Scope of Work.

**Comment 67:** NYC DOE this month released a diversity plan, which has been criticized as timid, weak, and limited, for failing to adequately address racial and socioeconomic segregation. How would the proposed elementary school meet or exceed diversity goals? (47)

**Response:** This is not a comment on the Draft Scope of Work.

*SAFETY AND SECURITY*

**Comment 68:** A discussion of safety and security is absent in the document.

The mission of the Khalil Gibran School is an important one, and supported strongly by the community. However, tolerance is not universal. Instances of domestic terrorism and violence toward Muslims and their institutions are escalating. The DEIS must thoroughly address the issue of safety and security. This must include:

- Requirement for conduct of a Threat and Vulnerability Assessment.
- Requirement for conduct of a Safety and Security Risk Assessment.
- Provisions to blast-proof the buildings at the site and to prevent progressive collapse. (32)

**Response:** The requested information is outside the scope of the SEQRA / CEQR impact assessment.

**SHADOWS**

**Comment 69:** A comprehensive shadow study must be performed to show effect in the broader study area (minimum 1 mile radius). (20)

If the shadows of the building extend past the study area, then the study area isn't large enough. Please revise the renderings to show the full extent of projected shadows. (104)

The "study area" is also insufficient...limiting it to 400' will not comport with the shadow cast by the actual height of the almost 1000 foot tower. It is a poor template for understanding the possible effects of this non-contextual and excessive overreach. (81, 90, 92, 93, 95, 103, 114)

Light studies must broaden. (51, 112)

The study area must include the extent of all shadows created by the full height of the two towers, including proposed bulkheads if they are not sufficiently

perforated to allow sunlight penetration. For the taller structure, this will be 986 feet.

This means that the shadow study should be expected to exceed the geographic boundaries set for other elements of the DEIS. (32)

**Response:** A comprehensive, detailed shadow study will be conducted, following the methodology set forth in the *CEQR Technical Manual*. The shadow study will use a study area defined by the longest shadow that the proposed project could cast between one and a half hours after sunrise and one and a half hours before sunset. The longest shadows occur on the winter solstice and are 4.3 times the height of a structure. For example a 1,000-foot-tall structure would generate a study area encompassing the project site and a perimeter around the site's boundary with a radius of 4,300 feet.

**Comment 70:** The developer should produce a shadow study as well as a surface reflection study. (12, 13, 34, 38, 47, 66, 69, 81, 90, 92, 93, 95, 103, 101, 119, 133, 145)

It is important that shadow studies be considered for the new towers that are being built. The towers that have been proposed are much taller than any other tower in Downtown Brooklyn and would significantly change the landscape of the area. Moreover, these towers would be next to 4-story residential buildings and entirely shift their surrounding views. The sheer height of the proposed towers separates it from the rest of the Brooklyn skyline. In addition, reflections from the proposed glass towers must be evaluated. We are also concerned about wind patterns as the area is increasingly windy as a result of the many tall buildings that have been constructed in the area. (2)

The scope should include impact of shadows, reflections and wind of the new towers. (9, 18, 36, 52, 87, 142, 153)

I would also like to request a shadow, wind and reflection study, again in a one half mile radius. We already have a tremendous wind tunnel problem at the corner of Atlantic and 4th Avenue. I can only imagine how much worse it will be with the addition of a building the size of the Chrysler building. (121)

**Response:** A shadow study will be conducted, following the methodology provided in the *CEQR Technical Manual*. The extent of the shadow study area will be defined by the longest shadow that the proposed project could cast as described in the previous comment. Reflectivity or glare studies are not considered or required under CEQR.

The proposed project is not located in an area that typically experiences high wind conditions (i.e., a waterfront location) and the proposed project's layout and massing would not create canyon-like designs such that it may result in significant wind issues. Thus, an analysis of wind conditions and its effect on pedestrian level safety is not warranted under CEQR.

**Comment 71:** Shadow studies on a 12-month basis must be included in studies. (47, 89)

**Response:** Following the guidelines in the *CEQR Technical Manual*, the shadow study that will be produced for the EIS will model shadows on representative days in each season, plus an additional day representing the growing season in New York City. Specifically, the shadow study will model shadows on the winter solstice, the summer solstice, the spring and fall equinoxes, and an additional day in the growing season, typically May 6/August 6, halfway between the summer solstice and the equinoxes.

**Comment 72:** Adjacent development gives one a sense of how the proposed project would feel to the residents on State Street and other areas of Boerum Hill. The building at 333 Schermerhorn is too high, but it is a done deal. It casts a shadow and blocks the morning winter sun on Pacific Street where I live, which is four blocks to the southwest and between Bond and Nevins. Page 13 of the proposal appears to assume that pedestrians never look up, and that a massive tower would not affect the pedestrian experience. (47)

**Response:** A comprehensive shadow study will be conducted for the proposed project according to the guidance provided in the *CEQR Technical Manual*. The DEIS will also include an Urban Design and Visual Resource analysis, which will assess the changes to the public view corridors and pedestrian experience with the proposed project.

**Comment 73:** There are many other aspects of the development that should be studied including the impact on shadows over large swaths of low-rise neighborhoods. (86)

EIS shadow study also needs to include all residential gardens on the north side of State Street, between Nevins & 3rd Ave. Only considering 16 Sycamores Park & the Baptist Temple on the adjacent block is not acceptable. (142)

As State Street's charm and environmental pluses rely on its trees and plants, a study by arborists of the shadow patterns as it applies directly to the existing trees in the 500 and 400 block is essential, including both on the street and in backyards. (139)

My building has a courtyard that adds tremendously to our property value and I am concerned about shadows reducing its enjoyable use. (123)

The plan does not properly show the effect of the shadow it will cast on our buildings and back yards, affecting the light and the growth of our yards. (15)

The landscape and skyline has radically changed to the point where current residents no longer recognize the place they live in and are now assaulted not only by congested streets, noise, dust, but by shadows where once there was sunlight. Homeowners in Fort Greene say that their sunny gardens are engulfed in shadows. (89)

## **Appendix A: Response to Comments on the Draft Scope of Work**

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**Response:** The shadow analysis in the EIS will conduct a thorough survey of the study and inventory all publicly accessible open spaces, including parks, playgrounds, plazas, schoolyards (if open to the public during non-school hours), greenways, and landscaped medians with seating. Under *CEQR Technical Manual* methodology, the following are not considered to be sunlight-sensitive resources and their assessment is not required: private open spaces, including private front or back yards, court yards, City streets and sidewalks (other than improved Greenstreets medians), buildings or structures (other than features of historic architectural resources that have been identified as sunlight-dependent for their appreciation by the public, such as stained glass windows in a historic church).

**Comment 74:** I am pleased to read reference to the Rockwell Place Garden in [the Shadows section] of the draft scope of work. Community gardeners have expressed great concern to Community Board 2 about the impact of the proposed project on the garden, established almost 40 years ago. (3)

**Response:** Publicly accessible community gardens that are located in the longest shadow study area, such as the Rockwell Place Garden, will be included in the shadow study.

**Comment 75:** The 986-foot-tall and 531-foot-tall towers would create a wall that will seriously curtail air, sky, and natural light from its neighbors. (18)

If it were constructed today, the larger tower of 80 Flatbush would be the 12th tallest building in New York City; over the course of the year, the building would create extremely long shadows—well into other neighborhoods—even were it not fitted out with its particularly tall bulkhead. There will be a profound impact on sun-sensitive front and rear gardens, as well as whole households on blocks of historic homes in Boerum Hill along State Street, due West of the proposed towers, as well as in Fort Greene. In winter months, this will likely include Fort Greene Park, Long Island University Athletic Center, and Brooklyn Technical High School. (32)

**Response:** A shadow study will be conducted per *CEQR Technical Manual* guidelines. The longest shadow study area will be comprehensively surveyed for publicly accessible sunlight-sensitive resources such as public parks and plazas and sunlight-dependent features of historic resources. The extent and duration of incremental project-generated shadows will be quantified in a table and illustrated in diagrams. The potential effects of the incremental shadows will be assessed for each resource. As discussed in Task 12, “Air Quality”, the DEIS will assess the potential for the proposed project to affect air quality.

**Comment 76:** 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. (12)

**Response:** Shadows fall to the west in the morning, to the north in mid-day, and to the east in the afternoon, moving continuously over the course of each day. A detailed shadow study will be produced following the guidelines of the *CEQR Technical Manual* and will assess the effects of any project-generated shadows that may fall on publicly accessible sunlight-sensitive resources, which include public parks and other open spaces, and sunlight-sensitive features of historic resources.

### **HISTORIC AND CULTURAL RESOURCES**

**Comment 77:** Without limitation by the proposed 400-foot study area boundary, please include the Boerum Hill Historic District as currently mapped and as submitted to LPC for expansion in the inventory of historic resources to be evaluated. (3)

**Response:** The proposed expansion of the Boerum Hill Historic District falls outside of the boundaries of the 400-foot study area for historic and cultural resources, which is determined by CEQR.

**Comment 78:** 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. (12)

**Response:** The *CEQR Technical Manual* guidelines note that for Historic Resources, a study area larger than 400 feet is appropriate for projects that affect historic districts, involve construction in areas with difficult subsurface conditions, large-scale developments or area rezonings, or could affect the context of historic resources some distance away (e.g., shadows that may extend outside a 400-foot radius). The proposed project would not involve a general large-scale development, area rezoning, or construction in an area with difficult subsurface conditions, and the project site is not located within a historic district. However, shadows on sun-sensitive historic resources outside the 400-foot study area will be considered in the DEIS Shadows analysis.

**Comment 79:** Boerum Hill, a New York City historic district with many buildings on the national and state registries of historic places is the neighborhood within which the proponent seeks to build. It is comprised of many 4-story brownstones that are wildly dissimilar to the 80 Flatbush proposal. (2)

While the project is touted as being located in Downtown Brooklyn, most of the property is actually historic Boerum Hill along the southern half of Third Avenue and along State Street. Many of the buildings surrounding the project, including

those on the 400 and 500 blocks along State Street, have considerable historic importance. Most of the structures were built in the 1850s through the 1920s, and could easily be eligible for historic designation; some already enjoy landmark status.

The extreme height envisioned for the tower—especially considering the massive bulkhead—is unprecedented for a historic brownstone neighborhood, or in fact, any low-rise residential neighborhood within New York City. This tower is proposed to be located only 60 feet from the building line of a 19th century brownstone on State Street and Third Avenue, across State Street from other historic brownstones, and directly across Flatbush Avenue from the iconic One Hanson Place. (32)

We oppose the erection of such a building in our neighborhood for both practical and aesthetic reasons. A tower like this must not be inserted into a landmarked 19th century neighborhood. (83, 136)

This massive twin-tower structure threatens to distort the aesthetics of the neighborhood. (48)

Task 16 of the DEIS must include a discussion of destruction of historic elements of the existing school building, to be replaced with a jarring, non-contextual and inappropriately tall glass tower. (32)

**Response:** The DEIS will address the issue of the project’s connectivity with the surrounding neighborhoods in the Urban Design and Visual Resources, as well as the Neighborhood Character chapters of the DEIS.

**Comment 80:** Include review by the Landmarks Preservation Commission (LPC) with respect to designated landmarks including 1 Hanson Place and the historic Fort Greene neighborhood. (120, 130, 135)

**Response:** LPC will review the DEIS analysis of historic and cultural resources.

**Comment 81:** 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. (12)

**Response:** Comment noted.

**Comment 82:** I'm glad for what preservation is promised by Alloy for the historic buildings (provided, of course, those promises are kept), but it says something when the developer's own "Preserve historic fabric" diagram shows the planned destruction of the historic building that currently links the two buildings Alloy preserves to keep standing. (58)

**Response:** Comment noted. Chapter 7, "Historic and Cultural Resources," of the DEIS will consider the potential of the proposed project to affect architectural resources.

**Comment 83:** Inclusion of a review by the Landmarks Preservation Commission with respect to designated landmarks including The Williamsburg Savings Bank Building and the historic Fort Greene neighborhood. (39)

**Response:** LPC will review the DEIS analysis of historic and cultural resources.

**OPEN SPACE**

**Comment 84:** An additional task should be undertaken for the open space assessment conducted for the Sixteen Sycamores Playground. Specifically, this task should determine the adequacy of the Sixteen Sycamores Playground as an open space through the identification of other projects expected to be built that would be completed before or concurrent with the project that would impact future utilization of the playground. Contributing buildings should be screened for two criteria when this playground is the nearest open space. One screening should be for buildings that contribute worker population as potential playground users for passive recreational activity within one quarter mile of the playground. The other screening should be for buildings that contribute residential population that might also include active recreational activity within one half mile of the playground. (1)

**Response:** The Sixteen Sycamores Playground will be included in the overall assessment of Open Space Resources within the study area and will consider the effects placed on area open spaces by project-generated worker and residential population.

**Comment 85:** Boerum Hill is the neighborhood in Community District 2 (CD2) that is most underserved by public open space so I was surprised to read, " ... the project site is located in an area that is considered to be neither underserved nor well served by open space." Further, the open space in CD2 is overwhelmingly programmed for passive recreation, many of the parks and playgrounds are small in size, and some open space is publicly accessible but privately owned. The inventory should therefore indicate whether each space is for active or passive recreation, provide the size in acres, and state whether it is publicly or privately owned.

Please note that some inventories of open space may not list the so-called "BAM Park," bounded by Fulton Street, Lafayette Avenue and St. Felix Street. This city-owned property is currently under the jurisdiction of the Department of Housing Preservation and Development but following the imminent reconstruction of the open space, it will be transferred to the parks department's portfolio. (3)

Can the scope's open space analysis be broken down to separate plazas from green space? While Fort Greene Park is to the northeast, Boerum Hill is lacking green space and greatly needs its own park. (9, 51)

**Response:** The project site is in an area identified as neither well-served nor underserved by existing open space resources, as defined by the *CEQR Technical Manual*. As described in the Scope, analyses of the potential direct and indirect effects of the proposed actions in regards to open space will be performed.

**Comment 86:** We need green space. We would like the developers to think about green space that could be taken by them, bought by them, and developed. One space we suggest is on the corner of Schermerhorn Street and Hoyt Avenue, across the street from 189 Schermerhorn Street, that is now a parking lot. (151)

**Response:** Comment noted.

**Comment 87:** Boerum Hill in particular has no parks and is in desperate need of additional green space. This is according to the City's own metrics. We believe that there will be direct effects on open space as the number of people in need of such space, and in particular, active green space, will increase dramatically and this lack of open space must be analyzed. (2)

The EIS needs to assess the total number of residents generated by this project's additional impact on open space requirements in an area with an existing open space deficit. (132)

How will the addition of almost 1,000 new housing units affect the existing, limited green space in both Boerum Hill and Fort Greene? (34, 108, 112)

**Response:** As described in the Scope and in accordance with the *CEQR Technical Manual*, analyses of the potential direct and indirect effects of the proposed actions in regards to Open Space will be performed.

**Comment 88:** The development does not include any open space for the community. While green space is shown on the roofs of the schools, they are small and may not be accessible to the public. (15, 21, 24, 26, 28, 32, 43, 44, 49, 53, 71, 76, 78, 91, 100, 116, 127, 134, 141, 143, 144, 147, 150, 153)

Task 16 of the DEIS must include a discussion of the lack of community green space or green walls in the proposed scheme (32)

There is very little public green space in the Boerum Hill area. Opportunities need to be considered to support the increase in population with appropriate outdoor,

public gathering spaces. Not just concrete pedestrian plazas, but actual areas of respite and relaxation, critical to maintaining and building a Brooklyn community. What are the quantitative and qualitative measurements to be used for Open Space? And is just maintaining the status quo even adequate? (96, 11)

Given that the community has little open space, how does the city propose to ensure open space for the community while increasing the number of residents? There are only a few small parks in the neighborhood with little green space and broken equipment. Children are already breaking into locked school playgrounds with wire cutters and climbing dangerous fences to find space to play. (69)

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? (12)

**Response:** The private spaces on the rooftop of the proposed project would be accessible to the building residents and tenants and would contribute to an overall alleviation of the open space demands by residents/tenants in the study area. The proposed lower school and high school will be provided adequate outdoor space for student use on the schools' rooftops.

**Comment 89:** The neighborhood's limited green spaces are already congested and overused. Why is this project not offering any additional public space or green space like the public plaza recently opened at 300 Ashland? (14, 75, 79, 81, 90, 92, 93, 95, 102, 103, 117, 131)

**Response:** The project site is in an area identified as neither well-served nor underserved by existing open space resources, as defined by the *CEQR Technical Manual*. As described in the Scope, analyses of the potential direct and indirect effects of the proposed actions in regards to Open Space will be performed.

## URBAN DESIGN AND VISUAL RESOURCES

**Comment 90:** As is indicated in the current proposal, the residential towers will be the tallest buildings thus far in the Downtown Brooklyn area (the buildings are not in Downtown Brooklyn, but in Boerum Hill), and would obliterate the views of some of the already existing icons of the Brooklyn skyline. The Williamsburg Savings Bank Tower, or 1 Hanson Place, is a focal point of Downtown Brooklyn. It is a beautiful and historic piece of architecture that has become personally significant not only with its inhabitants, but with many visitors to Brooklyn. Current residents at 1 Hanson Place are concerned that their beautiful tower that they fastidiously maintain will be blocked completely from sight. The view of this building should be considered when finalizing the height and design of the new towers so as not to detract from the Brooklyn skyline as it exists now, but rather enhance it and create a sense of cohesion within the context of the area. (2)

## **Appendix A: Response to Comments on the Draft Scope of Work**

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I have concerns about a large glass skyscraper that blocks both the low rise brownstone area and the views of [1 Hanson Place] from the surrounding neighborhood. (14, 17, 67, 71, 81, 90, 92, 93, 95, 98, 103, 108, 119, 137)

The proposed tower is out of context even in consideration to new, ongoing and planned hi-rise construction in the neighborhood. It is an affront to the historic nature of Williamsburg Savings Bank. A tower of this height should not be permitted to block the views of this popular and iconic landmark. (36)

The urban design analysis should look at the obstructed view corridor of the iconic Williamsburg Savings Bank building from the west and the south. The proposed designs clash with the local urban design. (9)

The two towers will block the sight lines of the landmarked Williamsburg Savings Bank Tower from most western neighborhoods, including Manhattan and the Harbor. (14, 117)

Wherever I've lived in the borough, from Williamsburg to Park Slope to Cobble Hill and now, Ft. Greene, I have always had a view of the Williamsburg Savings Building and its clock tower. It is one of very few iconic buildings of historical significance still standing among these soulless, hideous glass and steel monstrosities that recently began to scar the Brooklyn skyline.

Not only is the building's height and design as proposed completely out of context with neighboring building -- and entire neighborhoods -- it would block the view of the WSB from thousands of apartment buildings and houses; it would swallow the only treasured "skyscraper" that speaks to Brooklyn's rich past. (22)

Loss of the iconic view of Williamsburg Savings Bank building. Further study on the proposed geometries / urban design should look at the obstructed view corridor of this landmark from the west and the south. The proposed designs clash with the local urban design in both scale and material. (51)

**Response:** As noted in the Draft Scope, the Urban Design and Visual Resources chapter of the DEIS will assess the relationship of the proposed project to visual resources, such as the former Williamsburgh Savings Bank, and assess the potential for impacts to visual corridors in the surrounding area.

**Comment 91:** It should be clarified at the outset that the neighborhood character to be assessed and conformed to must be historic Boerum Hill. The Draft Scope indicates that neighborhood character is made up of factors including land use, urban design, visual resources, historic resources, socioeconomic conditions, traffic, and noise. However, we submit that neighborhood character is also a factor of the people who live in the area and the area's small business community serving them. What makes New York City's neighborhood worth investing in and fighting for are the people. Please do not dismiss this important factor in the analysis.

From an urban design point of view the current proposal seems far too reminiscent of “tower in the park” design, an outdated and unsuccessful approach which altered life in the streets and detracted from what Jane Jacobs described as the need for, “...eyes upon the street, eyes belonging to those we might call the natural proprietors of the street.” Boerum Hill has eyes on the street and community dynamics worthy of respect and consideration in any development. (2)

**Response:** As stated in Draft Scope of Work, the DEIS will assess the proposed project’s potential effects on the surrounding area, both in terms of its physical presence (in the Urban Design and Visual Resources analysis) as well as its potential effects on the character of the neighborhood.

**Comment 92:** Forward thinking is also needed in regard to Urban Design and Visual Resources. As stated by BHA, the scale of Downtown Brooklyn development needs to blend with Boerum Hill. Allowing a 74 story tower directly adjacent to State Street (and looming over Atlantic Avenue) will damage the fabric of the neighborhood, and will be looked at now, and in the future, with bewilderment. Blocks of Brownstones are iconic and historical, and are what help make Brooklyn unique, marketable, and economically sustainable. It’s the new white picket fence. Brooklyn is not just the Williamsburg Savings Bank. What are the specific criteria for scale of the buildings, view corridors and competition with icons in the skyline? (11)

**Response:** The EIS will consider the potential effects of the proposed project’s size and height on the urban design and visual resources of the surrounding area.

**Comment 93:** The proponent seeks exceptions to the current setback requirements. These setbacks exist so as to provide light and a feel of less density and greater community on the ground. We do not see a rationale for this exception in the Draft Scope and request that the EIS thoroughly analyze this and produce evidence to support the request. (2)

Entirely out of context with the scale of the existing Boerum Hill neighborhood in which its two major boundaries lie, and towering 20+ stories higher than even The Hub and the iconic One Hanson Place, 80 Flatbush would make substantial alterations to the streetscape of the neighborhood by noticeably changing the scale of buildings, and obstructing view corridors of, and competing in the skyline with, the historic and iconic One Hanson Place.

Moreover, the current zoning of the small, irregularly shaped site thoughtfully requires setbacks, which are essentially eliminated in the design of the two towers; only 60 feet separates the larger tower from a historic brownstone at the corner of State Street and Third Avenue. The small, recessed entryway does not constitute an appropriate setback for a building of such menacing height.

Therefore, the project requires actions that would result in physical changes to the project site well beyond those allowable by existing zoning and which could easily be observed by a pedestrian from street level. (32)

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. (12)

Adding a mass to an otherwise residential neighborhood that, with 112 stories in total is larger than the Freedom Tower, is simply put an insult to the community of Brooklyn, the BAM Cultural District, and the historic buildings such as the Williamsburg Savings Bank that it would obscure from view even more than the recent smaller towers already have. (117)

Such massive structures change the complexion of the neighborhood with no real coordinated approach at neighborhood and city planning. (14)

I urge ECF and its consultants to pay particular attention to the pedestrian experience on State Street, between 3rd and Flatbush Avenues [in reference to urban design and visual resources]. The three- and four-story rowhouses and four- to eight-story apartment buildings on the south side of the street currently face buildings of similar heights. Further, there are no principal entrances to any of the buildings on the north side of State Street. (3)

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) [of the scope in task 8 Urban Design and Visual Resources]. (12)

Consideration must be given to include views looking down State Street from further away. (20)

The east side of Third Avenue between State and Schermerhorn is a visually pleasant and peaceful stretch of buildings. Why chop it up? (113)

The EIS should also include better study of the urban impact of this development. Why is massing situated along residential State Street, rather than at the corner of already-dense Schermerhorn and Flatbush? (140)

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 Williamsburg bank tower, which for almost a century has been a feature of the Brooklyn skyline and of the Ashland/Flatbush triangle. (12)

**Response:** The EIS will consider the potential effects of the proposed project's size and height on the urban design and visual resources of the surrounding area.

**Comment 94:** The proposed project includes one building that is 481 feet tall, with an additional 50-foot bulkhead, and a second residential structure that is 926 feet in height, not including its 60-foot high bulkhead. There are entrances to the proposed 350-seat primary school and one of the two residential buildings, as well as vehicular entrances to a loading dock and a parking garage. This is a dramatic change from the current conditions [in reference to urban design and visual resources]. (3)

**Response:** The Urban Design and Visual Resource chapter of the EIS will consider how the proposed project may change the pedestrian experience in the project area. The Transportation chapter of the EIS will consider the operations of and safe circulation around project's pedestrian and vehicular entrances.

**Comment 95:** As someone who moved to Brooklyn to escape the crowding of high rises in Manhattan neighborhoods, I am very concerned about the size and height of the proposed development. Is there any 50+ stories tower within 60 feet of a 4-story brownstone anywhere else in Brooklyn or would this be the first? (49)

**Response:** The EIS will consider the potential effects of the proposed project's height on the urban design of the surrounding area.

**Comment 96:** The assessment of the proposed project's potential to result in any visual and contextual impacts on the architectural resources must be considered for a radius of at least 1/2 mile from the site.

A detailed analysis of urban design and visual resources, within a radius of 1/2 mile from the site, is required due to the unprecedented scale and density of the proposed development in terms of its location not in Downtown Brooklyn, as marketed, but in Boerum Hill, as actually sited. (32)

**Response:** The scope of work for the analysis of urban design and visual resources Draft Scope has been modified to clarify that for visual resources and view corridors, views from more distant locations will be considered. The view corridor analysis will focus on those corridors that could experience the greatest change to the pedestrian experience, in consultation with ECF and DCP.

## **HAZARDOUS MATERIALS**

**Comment 97:** If the construction unearths lead, asbestos or other toxic substances in the demolition of buildings from the 1860s, what steps will Alloy take to notify the public and remediate? (14, 81, 90, 92, 93, 95, 103, 117)

**Response:** The DEIS will assess the potential for exposure to hazardous materials and determine the measures to be taken by the co-applicants to avoid and/or minimize such exposure. The DEIS will describe federal, state, and local regulatory requirements, which would be followed to address activities that would disturb or dispose of these materials.

**Comment 98:** The students at Khalil Gibran High School will remain in their current building as construction on the two new schools takes place. The noise level is already a concern, but the use of hazardous materials can also negatively affect the students. We believe that the proponent understands and will be exceedingly careful in the analysis of hazardous materials at the site. (2)

**Response:** The DEIS will describe requirements for testing and remediation. Based on the Phase II Investigation, a Remedial Action Work Plan (RAWP) and associated Construction Health and Safety Plan (CHASP) would be prepared for implementation during the subsurface disturbance associated with the proposed project.

## **WATER AND SEWER INFRASTRUCTURE**

**Comment 99:** Water and infrastructure must be considered in the context of an additional 4,000 to 6,000 new residential units. The area is uphill from the infamous Gowanus Canal superfund site. Water run-off and stormwater retention issues must be thoroughly analyzed. (2)

**Response:** The EIS will include an analysis of the proposed project's potential impacts on the water supply, wastewater and stormwater conveyance and treatment, including where sanitary and stormwater flow from the site would discharge.

**Comment 100:** Per the seventh bulleted task [in the draft scope], the assessment for a stormwater best management practice (BMP) concept plan should include an assessment based on maximizing the utilization of blue roofs. (1)

**Response:** Stormwater best management practices that could be implemented as part of the project will be discussed in the analysis.

**Comment 101:** The scope should include sewage impacts of adding the thousands of new residents and workers in an already overloaded sewage system as well as impacts on air quality. (36)

The water and sewer infrastructure analysis needs to be considered in context of the 4,000 to 6,000 housing units coming to the study area. (9)

How will 900 additional units affect the sewer system in the 500 and 400 blocks?  
(139)

Will the water and sewer be able to handle these new towers? (47, 101)

The EIS needs to assess impact on water/sewer load in study area. (13, 38, 50, 61, 63, 87, 86, 132)

Sewer facilities are already overburdened 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. (89)

Analyze the impact of the additional sewage flow on existing sewers and treatment plants. (34, 46, 51, 113)

This massive twin-tower structure threatens to welcome an increase in sewer loads. (48)

What is the impact of the new development in terms of sewage overflow going into the Gowanus area? And in heavy rainstorms and hurricanes when the low areas around the Gowanus get flooded? (53)

I would also like to see how the water and sewer load would be impacted on Dean Street. (69)

If the system equipped to handle the load that is coming courtesy of 80 Flatbush and all the other new development to the south? Will the developer be required to pay and/or wait for enhancements to the Red Hook WWTP? (96)

Please study water run off both during build and after site is complete? (139)

The draft scope document does not address the aging water and sewer infrastructure in the neighborhood. State Street and its environs are part of one of the oldest neighborhoods developed in Brooklyn. The water and sewer systems under the local streets are aging, fragile and prone to damage. The DEIS must include an analysis of these systems, including the water system valve plant adjacent to the site and security provisions for access points to the water system (hatches, stairwells, manholes) to prevent the possibility of tampering. (32)

**Response:** As noted in the Draft Scope, the EIS will include an analysis of the proposed project's potential impacts on water supply and wastewater and stormwater conveyance and treatment, including where sanitary and stormwater flow from the site would discharge as well as other planned upgrades in the area. If the assessment reveals the potential for significant adverse impacts, mitigation measures would be disclosed in the EIS.

**Comment 102:** 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. (27)

**Response:** The DEIS will assess the project's effects on water supply and wastewater/stormwater conveyance and treatment. The assessment will consider capacity and demand within the catchment area of the sewerage system, which extends beyond a 400-foot area.

### **SOLID WASTE AND SANITATION SERVICES**

**Comment 103:** How will garbage from two schools and a 900-unit high rise be removed in a low-rise neighborhood setting, so as to avoid obstructed sidewalks and rat infestations? (16, 98a)

How will population density issues affect trash? (61)

Impact of trash, cleanliness, and trash removal. When will traffic be removed from this site? Noise concerns. Needs further analysis. (51, 127)

How will regular pick up of garbage and street maintenance be impacted by traffic, especially in the 500 block of State St? (98a, 139)

What are the plans for Waste management going forward (i.e., compacting & underground storage of trash for all buildings)? Disposal away from residential homes? (127, 142)

**Response:** Task 1, "Project Description," of the Final Scope has been revised to indicate that a discussion of the sanitation demands and conceptual approach to the handling and storage of the project's projected solid waste demands will be included.

**Comment 104:** What are waste management & rodent abatement plans during demo & construction? This is an extremely serious health issue already in this area. (127, 142)

**Response:** The DEIS will include an assessment of construction-related activities and the rodent and vermin control measures that would be utilized by the project co-applicants.

### **TRANSPORTATION**

**Comment 105:** The vehicular and pedestrian impacts of the proposed cultural facility should be included in this study, whether it houses performance space or other art-related activity. (12)

**Response:** As stated in the Draft Scope of Work, the Transportation chapter will assess potential impacts related to the proposed project in the areas of traffic, transit, pedestrians, vehicular and pedestrian safety, and parking. The proposed cultural facility is included in those assessments.

*TRAFFIC*

**Comment 106:** Scoping should also include subway and car traffic trends, not solely at peak periods but at all times of day and night, to understand congestion impacts. Traffic at the crossroads of Brooklyn is such that the traditional peak/off-peak analysis fails. Traffic is congested throughout the day. Additionally, an analysis of each intersection near the development site should be conducted to understand possible safety issues. (2)

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. (12)

The traffic study is woefully under-cooked. (51)

The methodology employed by the traffic analysis is woefully inadequate. (62)

The scoping plan for the Environmental Study needs to consider the impacts on traffic. (13, 38, 46, 61, 87, 86, 102, 119)

The implications to vehicular traffic, foot traffic, and public transportation are difficult to quantify, but one could only imagine that in an already congested block, a proposal of this size will create a strenuous bottleneck for all who live and transit through the area. (48)

How will the additional traffic generated by the development (recreational and service vehicles), construction equipment, and required equipment such as generators NOT have an adverse impact on the general community? (34)

What will be the traffic, safety, and zoning impact of the proposed loading dock and parking garage entrances on State Street, which is an extremely narrow and residential street? (28, 101)

The transportation study area should be broadened to include Union Street and Smith Street. (122)

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. (27)

Transportation impact cannot 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. 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. (89)

Transportation issues: traffic, transit (surface and subway), pedestrians, vehicular and pedestrian safety, and parking should be considered over a study area of no less than a quarter mile due to the current load on all these areas. Currently the EIS mentions 18 intersections which are not identified and they should be spelled out. Again, the study area should be larger and look at more intersections and including the construction phases. (Where will the cranes be placed? Where will deliveries and supplies be staged? Which lanes will be closed and on what timetable?) (9)

The area of study must include a minimum of a one mile radius for all traffic impacts. (59)

**Response:**

The Transportation chapter, which will assess potential impacts related to the proposed project in the areas of traffic, transit, pedestrians, vehicular and pedestrian safety, and parking, will follow the guidelines in the *CEQR Technical Manual* and be submitted to the New York City Department of Transportation for review and approval. The Transportation chapter will describe how pedestrians and vehicles will access each land use on the site on each block, as well as describe the loading activities associated with the proposed project. NYCDOT will continue to review plans as further design details are developed to ensure efficient loading while maintaining safe pedestrian and vehicular circulation around the site.

According to the *CEQR Technical Manual*, intersections that are expected to incur more than 50 peak hour vehicle trips from the project increments will be considered in the traffic study as potential locations for analysis. Similarly, pedestrian elements such as sidewalks, crosswalks, and corners that are expected to incur more than 200 peak hour pedestrian trips from the project elements will be considered in the pedestrian study for analysis, and subway elements such as stairs, walkways, and fare control areas that are expected to incur more than 200 peak hour transit trips from the project elements will be considered in the transit study for analysis. The weekday AM, midday, and PM peak hours have been selected since they are the peak periods during which it is expected that the project increments would have the potential for significant impacts. In addition to the project increments, the effects of other planned and proposed development and transportation projects within the transportation study areas will be included in the assessments. The potential for transportation impacts related to the construction of the proposed project will be assessed in the construction chapter.

**Comment 107:** The DEIS will require: Traffic counts taken during peak events at Barclays within a 1/2 mile radius of the site to reflect actual traffic network impacts.

Due to the fact that events at the Barclays Center have an enormous impact on neighborhood parking availability, the off-street parking supply and utilization analysis to be conducted in Task 11 must cover the area within a 1/2 mile radius of the project site. (32, 96)

**Response:** The traffic study will follow the guidelines in the *CEQR Technical Manual* and be submitted to the New York City Department of Transportation for review and approval. According to the *CEQR Technical Manual*, traffic counts should be collected during typical conditions and not during special events when alternative traffic management plans could be in effect. Potential project impacts would be determined based on typical peak characteristics for a mixed use commercial/residential/school use. The parking assessment will follow the guidelines, which state that should the proposed project not be able to accommodate its own parking demand on-site or within a 1/4-mile radius of the site, it should be expanded to a 1/2-mile radius of the site.

**Comment 108:** The Draft Scope mentions 18 intersections to be analyzed without identifying them. To the extent those 18 intersections will be an outgrowth of the TDF, the public must be noticed of those intersections before the EIS is conducted and have opportunity to comment on the intersections' dynamics and the proposed analysis. (2)

**Response:** The Travel Demand Factors (TDF) Memo identifies that 16 intersections will be analyzed in the traffic study. The specific intersections were identified in consultation with the New York City Department of Transportation (NYCDOT) based on review and approval by that agency of the assumptions identified in the TDF memo. The Transportation chapter of the DEIS will provide details of the analysis and its conclusions and the public will have an opportunity to comment on the results of that transportation analyses.

**Comment 109:** The intersection of Flatbush and State would have to be completely re-evaluated. A traffic light would absolutely have to be installed there to ensure safety. (37, 127)

An extremely intense traffic study is essential for the corner of State St. and 3rd Ave. (139)

Significant concern has been expressed about State Street traffic associated with the primary school, the parking garage and loading dock. Please provide a robust traffic analysis of State Street, including a citation of all rules and regulations for the location of garage and loading dock entrances. (3, 97, 127)

State Street is already very congested and in no way can handle such a development in its current condition. (37, 113)

**Appendix A: Response to Comments on the Draft Scope of Work**

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I would also like to ask you to study the increase of traffic on both 3rd Avenue, State Street and Schermerhorn, especially if the Schermerhorn extension is removed. Please take into consideration the impact of a loading dock for this gigantic building on both 3rd Avenue and State Street. (121)

Only so much can be squeezed into a finite space, and narrowing streets with bump-outs, plazas and bike lanes further congests vehicles, including buses, Access-a-ride and necessary delivery trucks. (27)

Any loading dock on State Street should not be allowed on that residential street. (9)

Analyze how the addition of two large loading docks on to a residential street will impact street level quality of life. (34, 53)

How often will street closures on State St., Schermerhorn and on 3rd be necessary? (139)

Ensure that the commercial entrance is on Flatbush or 3rd Avenue and not State Street. (127)

How will the construction phase affect parking on State St., both in the 500 block and down further in the 400 and 300 blocks? (139)

How will everyday deliveries like postal, UPS, commercial and domestic be affected by traffic, especially during build? (139)

The traffic study should be based on recent re-zoning and policy decisions affecting all streets and especially the effects of the high density residential and school building on the adjacent brownstone community, especially because the loading docks for residential are currently located on State Street facing turning this street into a thoroughfare. (59)

**Response:** The potential for significant impacts of all proposed land uses including the two schools will be included in the transportation assessments for traffic, transit, pedestrians, vehicular and pedestrian safety, and parking. For traffic, these assessments will include all incremental vehicular traffic generated by the proposed project, such as autos, taxis, school buses, and deliveries. The proposed project is not proposing any permanent street closures. The Transportation chapter will describe how pedestrians and vehicles will access each land use on the site on each block, as well as describe the loading activities associated with the proposed project. NYCDOT will continue to review plans as further design details are developed to ensure efficient loading while maintaining safe pedestrian and vehicular circulation around the site.

**Comment 110:** School buses stopping on State St? We don't even have a city bus on State Street like buses that use Dean and Bergen and Livingston. Why? Because this is a tiny residential street. (122)

How will the elementary school buses line up on State St. twice a day? Will they have to extend the line-up further down State St. into the 400 block? How will this impact traffic both on State St. and at the already congested corner of 3rd. Ave.? (139)

Analyze the impact of citing school bus pick up and drop off on a residential street. How will this further exacerbate existing traffic back-ups on State Street? (34)

Where will school buses load and unload students, especially considering the constricted traffic lanes on Flatbush and the narrow roadway of State Street? (16)

More analysis on school buses on these streets in addition to current traffic load is required. \*Minimum Quarter Mile Study Radius\*. (51)

Where will school buses drop off/ pick up? How will this impact traffic (lane closures) on a permanent basis? (20)

Where and how will school buses access the area? Where will they onload and offload? Where will they idle (and how will that be policed)? (96)

Please consider as well the impact of school bus loading and unloading. Where would this happen and how would it affect traffic on State and 3rd Avenue. (121)

How will school buses for the elementary school pick up and arrive? (27)

**Response:** The applicant will request appropriate parking regulation changes along the blocks facing the school entrances to facilitate students loading and unloading school buses. The transportation analyses will conservatively assess the effects of the school arrival and dismissal vehicular and pedestrian activities concurrent with the weekday AM and PM peak hour commuter periods. Therefore, the anticipated effects of school bus and school student activity will be assessed in the Transportation chapter.

**Comment 111:** The proposed loading dock on State Street appears to be in violation of zoning which does not allow entry or exit to a loading dock within 30 feet of a residential district boundary. This also applies to residential boundary at Third Avenue.

In addition the proposal does not clarify how a loading dock is physically possible given traffic patterns and required dimensions. (20)

Move the permanent loading dock for the building to 3rd Avenue once the school has moved into their new building. (127)

Task 16 of the DEIS must include a discussion of the transformation of narrow, residential State Street into an enormous loading dock, solid waste removal and school bus staging zone (32)

**Response:** Comment noted. The project team is pursuing a waiver to reduce loading requirements through zoning text changes. As detailed designs progress, NYCDOT will continue to review the proposed curb cuts and loading areas to

ensure efficient loading operations while maintaining safe pedestrian and vehicular circulation.

**Comment 112:** What will be the effect on Atlantic and Flatbush traffic? (129, 145)

**Response:** The traffic assessment will include local streets such as Atlantic and Flatbush Avenues. The Travel Demand Factors (TDF) Memo identifies that approximately 16 intersections will be analyzed in the traffic study. The specific intersections will be identified in the Transportation chapter of the Draft Environmental Impact Statement.

**Comment 113:** How will this project impact weekday traffic on Nevins between Flatbush and Atlantic? Will it lead to more pollution from idling buses? (133)

**Response:** The traffic assessment will include local streets such as Nevins Street. The TDF Memo identifies that 16 intersections will be analyzed in the traffic study. The specific intersections will be identified in the Transportation chapter of the Draft Environmental Impact Statement.

**Comment 114:** I would also like to see how the traffic would be impacted on Dean Street. (69)

**Response:** According to the *CEQR Technical Manual*, intersections that are expected to incur more than 50 peak hour vehicle trips from the project increments will be considered in the traffic study as potential locations for analysis. Since it is not anticipated that Dean Street will be a major access route for the proposed project, it is not expected that Dean Street would meet the minimum thresholds necessary for inclusion in the traffic study because it would not have the potential for significant adverse traffic impacts resulting from traffic increments from the proposed project.

**Comment 115:** Analyze vehicular and pedestrian traffic flows and capacities of existing sidewalks and roads beyond the 15 intersections proposed. Specifically focus on the Flatbush/4th/Atlantic intersections. (34)

**Response:** The traffic assessment will include local streets such as Flatbush, 4th, and Atlantic Avenues. The TDF Memo identifies 16 intersections will be analyzed in the traffic study. The specific intersections will be identified in the Transportation chapter of the Draft Environmental Impact Statement.

**Comment 116:** There was considerable public and elected official opposition to a temporary closure of Schermerhorn Street, between 3rd and Flatbush avenues, by the project developer, the New York City Department of Transportation (NYCDOT) and other partners. The proposed site plan shows the permanent closure of the slip lane. Please provide traffic counts and other data by which the impact of the closure may be evaluated. (3)

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 Schermerhorn slip. Most of the cars that come along Schermerhorn continue onto the slip to access Flatbush Avenue. Removing the slip and throwing all the cars from Third Avenue and Schermerhorn 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 affect the whole area. All traffic patterns along Flatbush Av, Third Av, State Street, and Schermerhorn need to be studied as there will be severe impacts from the many years of construction and the large increase in population. (89)

Nor do I see any justification for closing the slipway connecting Third Avenue and eastward Flatbush Avenue. The little oasis formed by Schermerhorn/Third Avenue/Flatbush must remain as is, a dot of public amenity and necessity to partially offset the gross brutality of 80 Flatbush, even if built no greater than allowed by zoning. (70)

**Response:** The applicant is not proposing the closure of Schermerhorn Street between 3rd and Flatbush Avenues. Because it is currently being proposed as part of a neighborhood-wide pedestrian safety improvement project by NYCDOT, the transportation assessments will include it as part of the future “No Action” conditions. At the time of the Draft Environmental Impact Statement’s preparation, NYCDOT has not obtained approval of that element of the pedestrian safety project; therefore, the transportation assessments will include alternatives with and without the closure of Schermerhorn Street between 3rd and Flatbush Avenues.

**Comment 117:** If each family has three orders a week from amazon or similar, and half the families have deliveries of fresh direct, peapod etc., how many trucks will be riding down local streets daily? (53)

**Response:** The transportation assessments will include projections for all incremental vehicular traffic anticipated to be generated by the proposed project—autos, taxis, school buses, and deliveries. Per the *CEQR Technical Manual*, the traffic study will include peak hours when the incremental vehicular traffic anticipated to be generated by the proposed project has the potential for significant adverse impacts. These peak hours are expected to be the weekday AM, midday, and PM peak hours.

**Comment 118:** The following should be addressed in the scope of the DEIS: Given the tight street grid and how, therefore, some intersections will affect up and downstream traffic operations, we expect to see the developer have its consultant develop traffic

simulation models for all peak travel periods to ascertain if queuing will develop in the study area.

These models should span the entire Barclay's Center traffic mitigation area (that is, from Fourth and Third avenues north to Flatbush, including the affected section of Atlantic Avenue), State Street from Bond Street east, and streets east and north of Flatbush Avenue in the affected area, into Fort Greene.

The traffic studies should be conducted for peak weekday and weekend events at the Barclay's Center and typical weekday AM and PM peak commuting hours.

NYCDOT typically does not allow more than 5 to 7 seconds of green cycle time to be shifted from one intersection approach to another. Please confirm that the signal timing mitigation is within acceptable DOT standards.

Given 80 Flatbush will become a destination in its own right, the trip generation analyses should have no credit (trip reduction) for pass-by trips. Please confirm this. (32)

**Response:** All traffic analyses will be conducted per guidance in the *CEQR Technical Manual*, and will be reviewed and approved by NYCDOT. Per this guidance, the traffic study will analyze typical traffic conditions during peak hours wherein the proposed project has the potential for significant adverse impacts. A major event at Barclays Center would not represent typical traffic conditions that could be significantly impacted by the project. The weekday AM, midday, and PM peak hours are the periods during which it is anticipated there would be the potential for significant impacts; therefore, those periods will be included in the traffic study. During review of the traffic study in the Transportation and Mitigation chapters of the DEIS, NYCDOT will provide appropriate guidance on signal timing shifts, trip reduction credits, and the type of traffic capacity analysis software to be used.

**Comment 119:** It has been observed that traffic counts were taken midweek on State Street and Third Avenue after private schools were closed, many residents began their vacations, and the neighborhood was in quieter "summer mode" when traffic volumes are lower than the Spring or Fall.

Therefore, there is a serious concern regarding the validity of the conduct of traffic, parking, and pedestrian counts associated with environmental studies being conducted for the 80 Flatbush development. Although NYCDOT allows counts to be conducted up to and including Wednesday, June 28, given that public schools are still open for session, this particular area of Brooklyn is chock-full of private schools of many sizes that have been closed for about two weeks preceding the commencement of the project's count program. Furthermore, many public schools, while remaining open, have significantly reduced schedules that allow students to leave the premises to return home much earlier in the day.

The result of these two school-related operations conditions will result is atypical travel patterns and will not be representative of normal midweek conditions. Moreover, the data that were collected cannot simply be adjusted by application of a seasonal adjustment pattern because both the volumes are likely lower and the hourly patterns are different.

The DEIS will require all-new travel data to reflect typical school-year operations (i.e., after mid-September) and associated travel patterns are thus needed to proceed accurately through the DEIS process. The DEIS will require all new traffic data to support air and noise quality analyses. (32, 142)

**Response:** All counts were conducted in accordance with guidance in the *CEQR Technical Manual*, and were reviewed and approved by NYCDOT and New York City Transit Authority (NYCT). NYCT has recommended a modest growth rate be applied to subway counts collected in June for the proposed project, which will be added to the existing subway counts to reflect slightly lower transit use in June after some schools have closed for the summer, according to NYCT system-wide statistics. NYCDOT will review the traffic and pedestrian counts collected in June and determine whether a modest growth rate should be applied.

**Comment 120:** The area is prone to major traffic congestion. Flatbush Avenue is not a safe place to make deliveries, nor is it a good place for school buses to pull up, but neither is State Street for a host of reasons. The issues of loading docks and school drop-off and pick-ups must be carefully and thoroughly analyzed. (2)

The proposal of this building will exacerbate an already horrible traffic issue. (63, 67, 75, 77, 88, 149)

Streets are congested every morning and night. (64)

Area traffic and public transportation are already congested, especially during events at the Barclay's Center. How will this project avoid making these issues untenable? (14, 81, 90, 92, 93, 95, 103, 117)

As a result of new traffic patterns following the construction of Barclays Center, traffic at the intersection of State Street and Third Avenue has worsened. (20)

The DEIS must provide a detailed, comprehensive analysis of the significant impacts of the imposition of the too-tall and too-dense 80 Flatbush development specifically the increase in traffic in an area that already bears the full brunt of the Sam Schwartz Engineering Company's traffic mitigation for the Barclays center, an area that experiences crushing congestion, and the noise associated with it, on virtually a daily basis. (32)

**Response:** The traffic study will identify the potential for significant adverse impacts as a result of incremental traffic that would be generated by the proposed project during the AM, midday and PM peak hours. The Transportation chapter will disclose the locations where the potential for significant impacts exists, and the

Mitigation chapter will describe the recommended traffic improvements to mitigate potential impacts per guidance in the *CEQR Technical Manual*. The traffic study will be reviewed and approved by NYCDOT prior to its inclusion in the DEIS.

**Comment 121:** I attended a community meeting about the Department of Transportation safety plan for this neighborhood. One of the major points made by DOT was that there was little that it could do but make small changes here and there. While virtually none of the minor changes suggested by DOT have even been done, ECF and Alloy now propose drastically increasing the traffic and pedestrian congestion. Other than agreeing to pay for some minor improvements (if they even are improvements) at the corner of Flatbush and Schermerhorn, no improvements are even proposed. (71)

**Response:** The neighborhood pedestrian safety improvements proposed by NYCDOT are not yet approved. The transportation assessments will include the pedestrian safety improvements as part of the future No Action conditions if, at the time of the preparation of the Transportation chapter, they are approved. If the improvements are not yet approved, the transportation assessments will include future conditions with and without the proposed improvements to assess either possibility.

**Comment 122:** The draft document does not specifically address the project's location within the critical "jug-handle" of the Sam Schwartz Engineering firm's traffic mitigation for the Barclays Center or the general intensity of traffic in the vicinity.

At the very moment the Barclays mitigation plan's traffic pattern changes were implemented, the quality of life in the neighborhood deteriorated. The neighborhood experiences crushing traffic congestion. Numerous circling limousines and for-hire vehicles compound the congestion during events at Barclays should they not be idling illegally at fire hydrant locations, crosswalks, and bus stops. Event-goers in cars also overwhelm the local arteries in search of free (typically unavailable) curb parking because the Barclays plan specifically excluded provisions for adequate parking for such events, as it did accommodations for the queuing and idling of limousines and cabs.

Further constricting the local streets are commercial and residential dumpsters and roadway areas blocked off to serve as laydown areas for construction materials or equipment storage; this situation has proven to encourage double-parking.

The net effect is that traffic is unbridled in the neighborhood much of the time. The biggest impact is on emergency services—Engine Company 226 and ambulances battle with traffic daily. As such, the safety, security, and well-being of residents and businesses in the vicinity of 80 Flatbush are already at risk prior to development of the site. (32)

**Response:** The traffic study will identify the potential for significant adverse impacts as a result of incremental traffic that would be generated by the proposed project during the AM, midday, and PM peak hours. The Transportation chapter will disclose the locations where the potential for significant impacts exists, and the Mitigation chapter will describe the recommended traffic improvements to mitigate potential impacts per guidance in the *CEQR Technical Manual*. The construction-related traffic and pedestrian effects of the proposed project will be evaluated in the Construction chapter. These chapters will be reviewed and approved by NYCDOT prior to their inclusion in the DEIS.

**Comment 123:** This massive twin-tower structure threatens to distort the flow of traffic. (48)

These two towers will necessitate the incursion of large trucks into the daily traffic of an already over-burdened street-scape of Third Avenue and State Street. The EIS hardly mentions the effects of traffic that will result from these structures. (15)

**Response:** As stated in the Draft Scope of Work, the Transportation chapter will assess potential impacts related to the proposed project in the areas of traffic, transit, pedestrians, vehicular and pedestrian safety, and parking. The traffic studies will assess all vehicular peak hour traffic that would be generated by the proposed project, including deliveries.

**Comment 124:** Not only will the outsize and lengthy impacts be felt by neighboring residents during this specific plan for reconstruction ...the future design plans for thwarted automotive access and egress in an already overburdened and thoughtless DOT planning will exacerbate this squeeze to the detriment of a community which has been cavalierly dismissed by the DOT. The congestion is already tantamount to being in a third world country...before you/Alloy even begin.

The fixation on Pedestrian Plazas as if they were a predetermined requirement indicates the suspect and troubling rigid urban development cant of the moment. There are abundant...yes...excessive... “plazas” within a several block radius of this 80 Flatbush Ave plan. To name just two: the Times Plaza and the recently opened 15,000 foot plaza at 300 Ashland (Lafayette and Fulton). The proposed Schermerhorn/3rd Ave/Flatbush triangle as yet another planned “plaza” –will impede traffic even more. (114)

**Response:** The construction-related traffic and pedestrian effects of the proposed project will be evaluated in the Construction chapter. The construction assessment will describe construction staging areas, and include descriptions of the location and frequency of materials deliveries, number of construction workers and peak hour estimates of worker trips by transportation mode, the construction site access points for deliveries and workers, and the duration of construction activities. The transportation assessment in the Construction chapter will determine whether the construction activities related to the proposed project have the potential for

significant adverse transportation impacts. In the Transportation chapter, the neighborhood pedestrian safety improvements—including the NYCDOT-proposed closure of Schermerhorn Street between 3rd and Flatbush Avenues—will be assessed under future No Action conditions.

**Comment 125:** Has the traffic plan been developed with the most up-to-date information from the Department of Transportation? What is the plan to work with DOT to assure pedestrian safety and traffic calming? DOT has recently proposed to the community a new traffic flow plan around BAM and Times Plaza that promises increase pedestrian safety. I hope this DOT plan proceeds and will improve this area for residents. But new residential developments like this, can potentially overload the system with more resident drivers, more loading needs and of course more people. (57)

**Response:** NYCDOT has been consulted in developing the transportation draft scope of work. The Transportation chapter will assess potential impacts related to the proposed project in the areas of traffic, transit, pedestrians, vehicular and pedestrian safety, and parking. Vehicular and pedestrian safety will be evaluated per the *CEQR Technical Manual* guidance at traffic and pedestrian analysis locations. The neighborhood pedestrian safety improvements proposed by NYCDOT will be included in the transportation assessments.

**Comment 126:** Numerous modifications were made to the road network as mitigations for the Pacific Park nee Atlantic Yards mixed-use development, including in the vicinity of the proposed project. Please evaluate whether or not any of these previous changes need to be modified further as a result of the subject project. (3)

**Response:** The traffic study will identify the potential for significant adverse impacts as a result of incremental traffic that would be generated by the proposed project during the AM, midday, and PM peak hours. The Transportation chapter will disclose the locations where the potential for significant impacts exists, and the Mitigation chapter will describe the recommended traffic improvements to mitigate potential impacts per guidance in the *CEQR Technical Manual*.

**Comment 127:** 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. (27)

**Response:** The traffic assessment will include local streets such as Atlantic, Flatbush, 4th, and 3rd Avenues. The TDF Memo is currently in draft form. The Draft TDF Memo identifies that up to 16 intersections will be analyzed in the traffic study. The specific intersections will be identified in the Transportation chapter of the DEIS.

**Comment 128:** The DEIS must provide a detailed, comprehensive analysis of the significant impacts of the imposition of the too-tall and too-dense 80 Flatbush development specifically how the plan will be impacted should NYCDOT rightly disapprove the de-mapping of the exit lane of Schermerhorn to Flatbush southbound. (32)

**Response:** Neither the applicant nor NYCDOT is proposing to demap Schermerhorn Street between 3rd and Flatbush Avenues. NYCDOT is proposing to improve pedestrian safety by closing Schermerhorn Street between 3rd and Flatbush Avenues to vehicular traffic, which will be evaluated in the traffic study for the proposed project. If the neighborhood pedestrian improvements proposed by NYCDOT are approved by the time of the preparation of the Transportation chapter, they will be included in the No Action conditions. If the improvements are not yet approved, the transportation assessments will include future conditions with and without the proposed improvements to assess either possibility.

#### *TRANSIT*

**Comment 129:** The transit analysis must include a full analysis of the impacts of projected population increases in the neighborhood, bearing in mind the extraordinarily large number of residential units currently under construction within 1/2 mile of the project site, as well as the projected increase in the number of Long Island Rail Road passengers taking subways to and from Atlantic Terminal. (32)

The EIS does not address transit issues because the study area is drawn to exclude them—there is no subway stop within the proposed study area. (2)

Existing subway stations are all beyond the 400-foot 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. (27)

The advent of new housing and thousands of people commuting to school and work will generate a significant increase in transit and crowding. (2, 13, 20, 46, 88, 98, 119, 131, 133)

Subway/transit inundation not fully understood in the study. While the site sits at the intersection of many subway Lines, it fails to bring to attention to the impact it will make on an increasingly burdened "hub" that seems to worsen daily. (51)

What is the impact of new increased population attempting to enter subway stations during peak hours? Consider beyond the Atlantic-Barclays stations since people will use trains at Nevins Street and Hoyt Schermerhorn. Will they be able to get onto a subway toward Manhattan? Are the platforms, especially Nevins Street wide enough to account for the large number of people. It is doubtful that so many people will be living in the development and working in the adjacent office space, as stated during the community meeting. (15a, 53)

Analyze how the new development will strain the existing, over crowded NYC subway and bus system.

What mitigations will be provided to ease this additional burden? (34)

The scoping plan for the Environmental Study needs to consider the impact on public transit. (65, 86, 87, 148)

Will the traffic and public transit be able to handle these new towers? (101)

Adding towers is going to create the gridlock to the area which is already under huge pressure of overcrowded subway. (64)

Our transit system is already dangerously crowded and crumbling. The situation is desperate, needed repairs will make it worse and this project proposes bringing around 2,000 more people into the area! What provisions are being made to the infrastructure of our neighborhood to handle this? (124)

The EIS needs to assess impact on Atlantic Avenue subway station capacity and safety. (12, 50, 132)

It bothers me that the developer actually said that Atlantic station is only the 26th most trafficked station in the city and that we can absorb more and I ask you, when was the last time you were there during rush hour during any day of the week? (17)

The subway lines servicing the Barclays Center-Atlantic Avenue Station, Nevins Street Station and Hoyt-Schermerhorn Station are already experiencing significant delays and service failures due to aging infrastructure, years of deferred maintenance, and unprecedented ridership.

Moreover, service issues at New York Penn Station are commonplace, forcing Long Island Rail Road customers to find alternate means of access into the city—many changing their commuting routines to instead use Atlantic Terminal. The Penn Station “Summer of Hell” scenario will certainly contribute to this phenomenon much like the transit strike of the early 1980s led to the widespread adoption of athletic footwear for commuting: once commuters to lower Manhattan get used to traveling through Atlantic Terminal, they will be more likely adopt this practice for the long-term. There can be no doubt that this will create even greater passenger loads on the already over- burdened subway system.

The transit analysis must include: A focus on the three separate subway stations proximate to the site. The project site is served by not one, but three NYCT subway stations: Barclays Center-Atlantic Avenue, Nevins Street, and Hoyt-Schermerhorn. In fact, a large number of users will choose to use the relatively small Nevins Street Station rather than cross Flatbush (because it is much easier to access and egress); others will travel to Hoyt-Schermerhorn for access to the A/C/G lines that do not serve the Barclays Center-Atlantic Avenue Station.

Line-haul capacity and travel demand analyses incorporating ridership modeling, for all three stations in proximity to the site, considering all subway lines serving them.

Key individual subway station elements must be included in analyses, including all fare-barriers, all entry stairwells, and platform stairwells. (32)

I am also very concerned about what effect this development might have on already-strained transportation options in the area. Has a study been made of the impact on the current capacity at the Hoyt-Schermerhorn and the Hoyt Street subway stations? Particularly during rush hour when those stations are already used to the maximum? (49)

**Response:**

As stated in the Draft Scope of Work, the transit assessments recommend analysis of elements of the Barclays Center-Atlantic Avenue Station. The final transit analysis locations that will be assessed in the Transportation chapter of the DEIS for potential significant adverse impacts related to the proposed project will be determined based on the Travel Demand Factors memo and consultation with the NYCDOT and NYCT. Based on the expected peak hour numbers and assignments of subway trips generated by the proposed project, it is expected that only portions of the Barclays Center-Atlantic Avenue Station but no other stations would be required to be analyzed, since only certain elements of the Barclays Center-Atlantic Avenue Station would have the potential to incur significant adverse transit impacts related to the proposed project. The transit analyses will include anticipated background growth and potential projects that are planned within the study area in the future No Action conditions. The potential for significant impacts related to the proposed project will be assessed using the future No Action conditions as a baseline, and the results of the transit analyses will be presented in the Transportation chapter of the DEIS. If necessary, any improvements needed to mitigate potential significant impacts will be described in the Mitigation chapter. The transit analyses will undergo review and approval by NYCT before being presented in the DEIS.

**Comment 130:** The intersections around Atlantic Terminal are already amongst the worst with congestion, poor parking, and safety concerns for pedestrians. What does the board think the impact will be on traffic, transit, parking, and pedestrian safety? (52)

**Response:** As stated in the Draft Scope of Work, the Transportation chapter will assess potential impacts related to the proposed project in the areas of traffic, transit, pedestrians, vehicular and pedestrian safety, and parking.

**Comment 131:** Is there current capacity at the Nevins 2/3/4/5 subway station, which has particularly narrow entrances or bus stops on Flatbush Ave, which already impede the flow of traffic, to accommodate the potential growth? (57, 113)

**Response:** As stated in the Draft Scope of Work, the transit assessments recommend analysis of elements of the Barclays Center-Atlantic Avenue Station. Based on the expected peak hour numbers and assignments of subway trips generated by the proposed project, it is expected that no other stations would be required to be analyzed because they would not have the potential to incur significant adverse transit impacts related to the proposed project.

**Comment 132:** The transit analysis must include: All bus lines serving the site must be studied both at the closest stops and at the peak-load points to identify potential impacts. Among these lines are the B41, 63, 67, 69, and 103; there may be other Fulton Street lines that are potentially affected based on ridership forecasts that should be part of this overall DEIS. (32)

**Response:** As stated in the Draft Scope of Work, the project-generated bus trips would be dispersed among 10 different bus routes, and bus line haul analyses would not be required since these lines would not have the potential to incur significant adverse transit impacts related to the proposed project.

**Comment 133:** What is being done by the developers to improve public transportation? (71)

**Response:** Per guidance in the *CEQR Technical Manual*, and in consultation with NYCT, it is recommended that portions of the Barclays Center-Atlantic Avenue Station be included for transit analysis in the Transportation chapter of the DEIS.

#### *PEDESTRIANS*

**Comment 134:** I would like to know how pedestrian and bicycle traffic will be addressed. How will pedestrians and cyclists be kept safe with the proposed increase in commercial traffic as well as an increase in private vehicle traffic due to the addition of parking spaces? (13, 69)

**Response:** Per guidance in the *CEQR Technical Manual*, and in consultation with the New York City Department of Transportation, it is recommended that at approximately 8 sidewalks, 9 corner reservoirs, and 10 crosswalks, pedestrian analyses be conducted since the proposed project is expected to generate over 200 person trips during the AM, midday, or PM peak hours. The pedestrian analyses will be presented in the Transportation chapter of the DEIS. Vehicular, pedestrian, and bicycle safety will be addressed in the vehicular and pedestrian safety assessment.

**Comment 135:** Please include a pedestrian traffic and safety study at the very dangerous crossing at Flatbush and Lafayette. Also compare crossing at 3rd and State now and with the addition of new residents once build is completed. (139)

The scoping plan for the Environmental Study needs to consider the impacts on pedestrian safety. (87)

**Response:** Safety will be addressed in the vehicular and pedestrian safety assessment, which evaluates traffic and pedestrian analysis locations to determine if any are high crash locations. In the event any high crash locations are identified, the project's vehicular and pedestrian increments are assessed against the crash statistics, and, as appropriate, safety improvements may be recommended to avoid significant adverse impacts to safety.

**Comment 136:** The proposed schools will require students to cross Flatbush Avenue at particularly dangerous intersections. (2, 14, 15, 16, 17, 20, 32, 81, 90, 92, 93, 95, 97, 98, 102, 103, 117, 119, 121, 145, 149, 152)

**Response:** Because the proposed project involves a new school and replacing an existing school, a school safety assessment is required and will be conducted in the Transportation chapter of the DEIS. The presence of high crash locations, uncontrolled crossings, non-Americans with Disabilities Act (ADA) compliant pedestrian ramps, and narrow sidewalks will be identified and assessed.

**Comment 137:** The status quo should not be measurement for pedestrian and bicycle safety. This area is already been targeted by the DOT as particularly dangerous. Why is the EIS only looking at high-crash locations? The study should take into account all the future changes in pedestrian, bicycle and motor vehicle traffic and infrastructure. Future problem areas can then be anticipated and mitigated with innovation and collaborative measures. (11)

**Response:** The safety assessments do not only encompass high-crash locations. Because the proposed project involves a new school and replacing an existing school, a school safety assessment is required and will be conducted in the Transportation chapter of the DEIS. The presence of high crash locations, uncontrolled crossings, non-Americans with Disabilities Act (ADA) compliant pedestrian ramps, and narrow sidewalks will be identified and assessed.

**Comment 138:** The EIS needs to assess impact on sidewalk capacity along State Street and Flatbush, pedestrian flow and safety at key intersections. (38, 50, 132)

**Response:** The pedestrian assessment will include local streets such as State Street and Flatbush Avenue. The TDF Memo is currently in draft form. The Draft TDF Memo recommends that pedestrian analyses be conducted at approximately 8 sidewalks, 9 corner reservoirs, and 10 crosswalks. The specific pedestrian locations will be identified in the Transportation chapter of the DEIS. Also, per the Draft Scope of Work, a vehicular and pedestrian safety assessment will be

conducted according to guidance in the *CEQR Technical Manual* to address potential safety impacts related to the proposed project.

**Comment 139:** NYCDOT has presented proposed pedestrian safety improvements for the area from Temple Square, adjacent to the proposed project, to Times Plaza. The DEIS should include these improvements in its analysis and report. (3)

**Response:** The transportation assessments will include the pedestrian safety improvements proposed by NYCDOT as part of the future No Action conditions if, at the time of the preparation of the Transportation chapter, they are approved. If the improvements are not yet approved, the transportation assessments will include future conditions with and without the proposed improvements to assess either possibility.

**Comment 140:** The New York City Department of Transportation 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. 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? (27)

**Response:** The pedestrian assessment for the proposed project will include Flatbush Avenue. Per the Draft Scope of Work, the project-generated trip increments will be analyzed at approximately 8 sidewalks, 9 corner reservoirs, and 10 crosswalks to determine the potential for significant adverse impacts. Also, per the Draft Scope of Work, a vehicular and pedestrian safety assessment will be conducted according to guidance in the *CEQR Technical Manual* to address potential safety impacts related to the proposed project.

**Comment 141:** Any 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. (9, 14, 51, 53, 81, 90, 92, 93, 95, 103, 117)

**Response:** Per the Draft Scope of Work, a vehicular and pedestrian safety assessment will be conducted according to guidance in the *CEQR Technical Manual* to address potential safety impacts related to the proposed project.

**Comment 142:** Will the pedestrian safety be able to handle these new towers? (101)

**Response:** Pedestrian safety will be assessed in the vehicular and pedestrian safety assessment. This assessment will be conducted according to guidance in the *CEQR Technical Manual* to address potential safety impacts related to the proposed project.

PARKING

**Comment 143:** In the analysis of parking, the 1/4- and 1/2-mile radii should be examined per the *CEQR Technical Manual*. However, given the boundary street is Flatbush Avenue and that few if any people will park east of Flatbush to cross over to the west side where this new development is to be situated, please confirm that this approach is used in the analysis of on-street parking. (32)

Further development on parking concerns for the neighbors and pedestrian safety. What are the metrics of this study? It should be, at minimum, a quarter-mile study radius. (51)

**Response:** Analysis of the 1/4-mile and 1/2-mile radius for parking inventories will be conducted per guidance in the *CEQR Technical Manual* and be reviewed and approved by NYCDOT. Should the project not be able to accommodate its own parking demand on-site, the availability of parking within 1/4-mile will be surveyed to accommodate the parking shortfall. Should the available parking within 1/4-mile of the proposed project not be able to accommodate the proposed project's parking demand, the availability of parking within 1/2-mile will be surveyed to accommodate the parking shortfall. If there was not available parking capacity within 1/2-mile to accommodate the proposed project's parking demand, the DEIS would describe that there would be a parking shortfall for the project.

**Comment 144:** 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. (27)

**Response:** The Draft Scope of Work and proposed project do not state that increased garage storage for vehicles is proposed. The transportation chapter, which will assess potential impacts related to the proposed project in the areas of traffic, transit, pedestrians, vehicular and pedestrian safety, and parking, will follow the guidelines in the *CEQR Technical Manual* and be submitted to NYCDOT for review and approval.

**Comment 145:** Parking is already impossible. A school, loading zoning will make current conditions worse. (46, 123)

Our community, Boerum Hill, cannot support this huge development in terms of increased parking. (75)

The scoping plan for the Environmental Study needs to consider the impact on parking spaces. (65, 86, 87)

Will the parking space be able to handle these new towers? (101)

## **Appendix A: Response to Comments on the Draft Scope of Work**

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What happens to parking [when the proposed project brings in 2,000 more people into the area], already difficult to find, as the Citi bike racks have removed great stretches of parking space around here? (88, 124)

**Response:** The parking assessment and 1/4-mile radius parking inventories will be conducted per guidance in the *CEQR Technical Manual* and be reviewed and approved by NYCDOT. The Transportation chapter will describe any potential parking shortfall related to the proposed project.

**Comment 146:** Will 80 Flatbush offer parking for free or at a discount to local residents? (96, 127)

**Response:** The proposed project will not include on-site parking.

**Comment 147:** On-street parking is at a shortfall in the vicinity of the project site, aggravated by the Barclays traffic mitigation noted above. The impact of this deficit in parking spaces can be seen in the number of cars parking illegally: some double-parked, some in no-parking or standing zones, and others blocking hydrants, crosswalks, loading zones, bus stops, or bike lanes. This is compounded by undue circulation of vehicles in search of the non-existent curb space. It can also be seen in the astronomical rise the cost of off-street parking nearby, the monthly fees well out of the reach of a majority of local residents and workers. (32)How much more double parking will occur due to deliveries? (69)

**Response:** The parking assessment and 1/4-mile radius parking inventories will be conducted per guidance in the *CEQR Technical Manual* and be reviewed and approved by NYCDOT. The Transportation chapter will describe any potential parking shortfall related to the proposed project.

**Comment 148:** To accurately gauge the parking shortfall, the parking analysis must consider: The impacts of 80 Flatbush during construction and after full build-out; The Barclays traffic mitigation and resultant parking impacts; Parking for teachers; Parking for large numbers of construction workers on this and other nearby developments; City Bike parking locations; Future provisions for car-share parking locations, a growing trend. (32)

**Response:** The parking assessment and 1/4-mile radius parking inventories will be conducted per guidance in the *CEQR Technical Manual* and be reviewed and approved by NYCDOT. These assessments account for background growth and the use of available parking by autos generated by nearby planned or proposed projects. The Transportation chapter will describe any potential parking shortfall related to the proposed project. The Construction chapter will address construction worker parking.

**Comment 149:** Given that on-street parking is at a premium in the general area, what mitigation is being considered for the inevitable on-street parking shortfalls to be identified? (32)

**Response:** The parking assessment and 1/4-mile radius parking inventories will be conducted per guidance in the *CEQR Technical Manual* and be reviewed and approved by NYCDOT. The Transportation chapter will describe any potential parking shortfall related to the proposed project. Because the proposed project is in *CEQR Technical Manual* Transportation Zone 1, any parking shortfall would not be considered a parking impact, and mitigation would not be required for parking shortfalls.

## AIR QUALITY

**Comment 150:** Will the air quality be able to handle the project, especially near truck routes? Analyze the impact on air quality for existing residents. How will the developer mitigate a further reduction in air quality? (13, 34, 38, 48, 69, 87, 101, 132, 142, 145)

**Response:** As described in the Draft and Final Scope and required by the *CEQR Technical Manual*, the DEIS air quality stationary source analysis will consider the effects of emissions from any proposed on-site fuel fired heating, ventilation and air conditioning (HVAC) system equipment (e.g., boilers/hot water heaters) on pollutant levels. The DEIS will also examine the air quality impacts associated with project-generated mobile sources. If the screening levels are exceeded, detailed quantified analyses would be performed at critical intersections in the area. A stationary source analysis will also be performed to evaluate the proposed projects' effects on air quality, which will include an assessment of potential impacts at sensitive uses such as existing residential buildings.

The DEIS will assess the project's construction activities and operations and their potential impacts on air quality and compare with the applicable air quality standards, which are established to protect public health. As described in the Draft Scope of Work and required by the *CEQR Technical Manual*, air quality mobile source modeling receptors will be selected based on a screening analysis to determine the intersections that would experience the most significant increases in either project-generated traffic or significant decreases in levels of service, as determined by the traffic analysis, and will conform to the project's traffic analysis network.

If the potential for significant air quality impacts are identified, potential mitigation measures will be considered.

## NOISE

**Comment 151:** The scoping plan for the EIS needs to consider the impacts on noise. (87)

The proposed project threatens to welcome higher noise pollution. (48)

**Response:** As described in the Draft Scope of Work and required by the *CEQR Technical Manual*, the EIS noise analysis will consider the potential for the proposed project

to result in noise level increases at noise receptors. If the potential for significant noise increases is identified, potential mitigation measures will be considered.

**Comment 152:** Will the area be able to handle the noise of the proposed project? (101)

What steps will be taken to ensure that this new development is a silent neighbor? (96)

**Response:** The EIS will quantitatively study mobile source noise as well as noise from the proposed school playground. This chapter will also qualitatively address the potential for the building structures to result in noise at surrounding receptors, such as from the building's mechanical systems.

**Comment 153:** What will the noise impact be for apartments facing Nevins Street? (133)

**Response:** Apartments facing Nevins Street constitute noise receptors, and the EIS will consequently identify any potential for significant noise increases at these receptors.

**Comment 154:** The DEIS must address potential noise generation by the bulkheads of both towers comprising both towers of the 80 Flatbush development.

It should also examine the noise generated from activities on the rooftop playgrounds and greenspaces in terms of its potential to impact existing sensitive receptors. (32)

**Response:** The EIS will include a study of rooftop school playground noise and its potential effects at surrounding receptors. As the described in the Draft Scope of Work, it is assumed that outdoor mechanical equipment would be designed to meet applicable regulations, which ensure that noise produced by equipment will not result in significant noise impacts, and no detailed analysis of potential noise impacts due to outdoor mechanical equipment will be performed. The EIS will qualitatively address the potential for the building structures to result in noise at surrounding receptors.

**Comment 155:** What specifically will be done to minimize the noise of HVAC and other mechanical and conveying equipment? (34)

**Response:** As the described in the Draft Scope of Work, it is assumed that outdoor mechanical equipment would be designed to meet applicable regulations, which ensure that noise produced by equipment will not result in significant noise impacts, and no detailed analysis of potential noise impacts due to outdoor mechanical equipment will be performed.

## **NEIGHBORHOOD CHARACTER**

**Comment 156:** The issue that needs to be looked at is the complete disregard for maintaining the current status of a neighborhood block. Such massive structures change the

complexion of the neighborhood with no real coordinated approach at neighborhood and city planning. (61, 81)

**Response:** The DEIS will analyze the project's effects on neighborhood character.

**Comment 157:** I recommend that the EIS include a comparative analysis that graphically shows elevation height of proposed buildings compared to similar scale buildings in Brooklyn and Manhattan. (20)

Is there any 50+ tower within 60 feet of a 4-story brownstone elsewhere in Brooklyn or would this be the first? (13)

**Response:** Chapter 8, "Urban Design," of the DEIS will include up-to-date graphic representation (including building heights) of the proposed project and surrounding area.

**Comment 158:** The scale and height of the proposed towers are not in keeping with the spirit of the Special Downtown Brooklyn District, which calls for transitional areas in between commercial and residential zoned areas. (13, 20, 73, 76)

Locating the tallest tower [of the proposed project] in Brooklyn next to low-rise residential buildings is a violation of transitional zoning and design context. (24, 26, 44, 49, 53, 74, 76, 78, 86, 91, 98a, 100, 102, 116, 126, 127, 134, 142, 143, 144, 148, 150)

I wish to emphasize the nature of my neighborhood and how out of place these structures will be and the harmful conditions their placement will wreak. Such siting violates the integrity of our low-rise residential buildings and, I believe, is a violation of transitional zoning and density.

While we at the eastern end of State Street may border on the Downtown district and on the Atlantic Terminal area, this has always been a strictly residential neighborhood of low-rise brownstone and small apartment buildings. This is an outrageous attack on this community and it doesn't even propose any amenities to mitigate it. These towers overwhelm our area and will do little to improve our neighborhood while making it less attractive. (15)

The density of this project is excessive for its location. Its height is also outside traditional neighborhood parameters, violating design context and transitional zoning. (48)

The Conservancy urges the developers to take into account the Community's concerns about excessive height and density. (6)

I urge you to keep in mind the human scale of the neighborhood, and the historic texture of the blocks. There are parts of New York that are already full of interchangeable, gleaming, immense high-rises. But must it be the goal of the city that every corner of the city end up looking and feeling like those blocks? (58)

**Response:** Comment noted.

**Comment 159:** What are the “predominant factors” in our “neighborhood character” that are going to be measured in the EIS. From our point of view, the successful economic development of Brooklyn has been mainly built on the comforting scale, natural surroundings, combined with Brooklyn's culturally and economically diverse communities. That is the neighborhood character that needs to be preserved. Not just for the benefit of those who have been here, but those moving here, and the developers who better be staying here.

We just want to build new residences right, integrating the old and new, the high and low, and the rich and the poor. (11)

**Response:** Methodologies outlined in the *CEQR Technical Manual* will be used to provide an assessment of neighborhood character. The chapter will provide an assessment of the proposed project's effect on neighborhood character using the other pertinent analyses (such as urban design and visual resources, historic resources, socioeconomic conditions, traffic, and noise).

**Comment 160:** I believe in development for affordable housing and like others in this community, I welcome the schools. But they must not be allowed to violate the zoning we have. They must not be allowed to shred the fabric of a small but vital neighborhood such as ours. (43)

I am not opposed to new schools, mixed income housing, or new residences in the area. They are all worthy goals, but these projects should fit into the context of our existing neighborhood. (86)

**Response:** Comment noted.

**Comment 161:** This is a low rise historic neighborhood consisting primarily of homes built before or shortly after the Civil War. Several such homes are on State Street directly across from the proposed project. Others are on the next block (Third/Nevins). The preservation of the neighborhood requires maintaining existing light and air and views of the sky. This is the most critical point, and is a stand-alone reason. Pedestrians come to the neighborhood to stroll along the historic facades and enjoy a glimpse of Brooklyn's past, when Walt Whitman perhaps walked these very streets. (47)

The project being evaluated proposes to construct a mixed-use development at a density that is, with the exception of Atlantic Yards, a state project, unprecedented in Brooklyn, including in the central business district (CBD). The 2004 Downtown Brooklyn Development Plan, which granted development rights only two-thirds as great as the proposed project, included density and height restrictions in a buffer zone between the CBD and Boerum Hill. Little in the proposed plan mediates between the height and density of the proposed project and rowhouse Boerum Hill. The project will certainly impact neighborhood character. (3)

This project should be opposed because it overwhelms the adjoining residential neighborhood of Boerum Hill. (31)

This is a small but vibrant and diverse community that is perilously close to being not only overwhelmed but actually destroyed by massive development that is not only on its boundaries, but is creeping into, and thereby shrinking, our community. (43)

Except for the bribe of the schools on this site, this plan is completely wrong for the character of the neighborhood. It is too densely populated and the buildings are too tall. It may be one thing for Flatbush Avenue or Schermerhorn to have very high mixed use buildings, but it is entirely different to take a small local neighborhood block and have it overwhelmingly dominated by huge tall densely populated building that would already overpopulate the current schools it is proposing. (61)

The adjacent Boerum Hill neighborhood will be diminished and lose its sense of place and distinctive character. This proposed 72 story glass mega tower on a residential brownstone street, looks nothing like any other structures in the area. It would dwarf the beloved clock tower building and change the skyline of Brooklyn forever. Is this residential area to be transformed into midtown Manhattan? We believe that our Brownstone communities are worth preserving. To preserve the unique value of our neighborhoods, please help us to fight the onslaught of Wall Street-like towers in our small neighborhoods. This project does not respect the surrounding neighborhood. (14, 18, 36, 110, 115, 117, 121, 30, 64, 148a)

**Response:** Comment noted.

**Comment 162:** The scoping plan for the Environmental Study should consider the density and height scale in relationship to brownstone Brooklyn. (46, 47, 63, 87, 88)

**Response:** As stated in Draft Scope of Work, the DEIS will assess the proposed project's potential effects on the surrounding area, both in terms of its physical presence (in the Urban Design and Visual Resources analysis) and its potential to affect the character of the neighborhood.

**Comment 163:** Neighborhood character—"contribution to the neighborhood character" depends on which neighborhood is referenced, Flatbush towers or State Street brownstones. The brownstone character should be full weight in any review and not sacrificed to the downtown plan. (9, 51)

**Response:** The analysis of neighborhood character will follow the guidance in the *CEQR Technical Manual*.

**Comment 164:** The affordability, diversity, history and character of our remaining neighborhoods must be preserved, and we must hold the line against these developers. (148a)

**Appendix A: Response to Comments on the Draft Scope of Work**

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**Response:** This is not a comment on the Draft Scope of Work.

**Comment 165:** The proposal of this building is disrespectful to the community, creates a monstrous eyesore into the heart of a residential street, and blocks all the views from the landmark Williamsburg Savings Bank building. (77)

**Response:** Comment noted.

**Comment 166:** Not to mention the impact the 80 Flatbush project would have on Brooklyn as a whole. Flatbush has turned into a corridor of modern residential towers, each more ugly than the next and Downtown Brooklyn is becoming overcrowded.

I hope you reconsider the size of the tower and keep it around the expected maximum of 34 stories. I'm in agreement that more housing and schools are needed. But one building changing the entire local landscape of this beautiful area just shouldn't happen. (29)

**Response:** Comment noted.

**Comment 167:** While I agree with the need to create more public schools to alleviate overcrowding and with ECF's decision to develop on 80 Flatbush, I vehemently disagree with Alloy LLC's plans for the site. Sitting in at 1,255,000 gsf, Alloy's proposed project is just too massive and would not fit well with the character of the surrounding neighborhood of Boerum Hill, Fort Greene, and Brooklyn Cultural District. (35)

**Response:** Comment noted. The DEIS will analyze the proposed project's effects on neighborhood character.

**Comment 168:** New York is perhaps the most international city in the world but at its heart is has always been a local city, a series of villages. This is especially true of Brooklyn. Brooklyn is defined by its human scale. Brooklyn's neighborhoods have become iconic throughout the world. You folks are the peoples' shield in protecting the viability and sustainability of these neighborhoods.

The Brooklyn neighborhood currently under "siege" is the BAM Cultural District. This neighborhood is poised on a knife edge, balanced precariously between hyper-development and thoughtful urban planning. I believe that Jane Jacobs would not approve of the proposed development. Simply put; it is not appropriate. The design scale and density are not in sync with this neighborhood to say nothing of traffic congestion, infrastructure and student safety concerns. (146)

**Response:** Comment noted. The DEIS will analyze the proposed project's effects on neighborhood character.

**Comment 169:** I also noticed there are no renderings of the 80 Flatbush proposal from State Street. This leads me to believe that the scale of this building will be wholly out of scale with those buildings across State Street which are mostly 3-4 story brownstone or

brick buildings. Renderings and other drawings of the proposal from a pedestrian's point of view looking down state Street toward Atlantic terminal and up at the tower from state street should be requested/produced to better understand the massive scale difference between the proposed tower and existing neighborhood just across the street. (84)

**Response:** The DEIS will include up-to-date graphic representation of the proposed project and surrounding area.

**Comment 170:** We are uncertain this planned development will impact the vibe of the neighborhood, and are concerned that it will completely change the dynamic of beautiful Boerum Hill in a negative way. (52)

**Response:** Comment noted. The DEIS will analyze the proposed project's effects on neighborhood character.

**Comment 171:** The proposed development will forever alter the character of our neighborhood.

The towers proposed are extremely large to be on the same street as 3-4 story high brownstones and way too close to Boerum Hill. Also, this developer does not have sufficient experience building such a large project in such a sensitive location.

One a personal note, as a longtime Brooklyn resident I am concerned by the fact that sightlines to One Hanson place – the most iconic building in our Borough will be blocked by this building.

Our neighbor at 330 Ashland place was encouraged by the city to alter their design to preserve the sightlines to One Hanson's architecturally significant and landmarked clocktower. No such provisions have been made by the developer of 80 Flatbush.

Indeed, the height of the shorter tower is close to the height of One Hanson Place and would block all views of the clocktower from Western Brooklyn. Views of the clock from Cobble Hill, Brooklyn Heights, Boerum Hill, and downtown Brooklyn would all be compromised.

A development of this scale seems completely inappropriate for this location and I hope you will hold the developer to the highest standard as they present impact studies on this project as it will have major impact on our community. (66)

**Response:** Comment noted. The DEIS will analyze the proposed project's effects on urban design and visual resources, including view corridors, as well as neighborhood character and will consider the effects of the scale of the project on the surrounding neighborhood.

**Comment 172:** My concern is that 80 Flatbush does not fit in with the scale nor the sensibility of the neighborhood whatsoever, and will only negatively impact the area moving forward.

The proposed construction does not appear to respect the neighborhood in many ways. The zoning exceptions that Alloy is requesting confirm this. For example, the setback exception that they are requesting be eliminated is in place to allow light to reach the street and the neighborhood. These exist to serve the community at large but they are specifically requesting that this not apply to their project despite the fact that they are also requesting a height exception with a FAR increase of 3x.

Not only does 80 Flatbush not preserve the sight lines of the landmarked Williamsburg Savings Bank building (an anchor within our community), but it also does not seem like the developers are taking into consideration designing at a scale and density that is in line with the neighborhood unlike Two Trees, which developed 300 Ashland. (85)

I wholeheartedly welcome the schools and the affordable housing but NOT if it overwhelms our neighborhood and destroys the fabric of this community. (150)

The existing community is outraged about this overly large twin-towered proposal. We welcome the schools and the affordable housing but not if it ruins our neighborhood. (49)

We truly welcome the schools and the affordable housing, only not at the expense of overwhelming our neighborhood. A development of this magnitude far exceeds the proper height for a brownstone community. (61, 134, 152)

**Response:** The DEIS will examine the effects of the proposed project on urban design, visual resources, and neighborhood character.

**Comment 173:** Why are we ruining our beautiful historic skyline with a monstrosity of a skyscraper? (41)

Boerum Hill is a small historic neighborhood in Brooklyn. I wish to appeal to your commonsense in this letter. Alloy Development's proposed project of huge twin towers is gravely and grossly out of place in Boerum Hill. (134)

The location is in Boerum Hill, which is a neighborhood of low-rise buildings. This neighborhood cannot support two high rises (one 74 stories). (75)

**Response:** The DEIS will examine the effects of the proposed project on neighborhood character.

**Comment 174:** The [proposed project's] high-rise apartment towers—900 units—will blot out our sky and add nothing to the neighborhood except crowding of services we're not preparing for. (50, 124, 132)

**Response:** Comment noted.

**Comment 175:** I would also like to see how the other quality of life measurements, besides traffic, water and sewer load and air quality previously listed, would be impacted on Dean Street. (69)

**Response:** In addition to assessing the project's effects on traffic, water and sewer infrastructure, and air quality, the EIS will assess how the assessment other technical areas, which may include a neighborhood's land use, socioeconomic conditions, open space, historic and cultural resources, urban design and visual resources, shadows, and/or noise conditions may contribute to neighborhood character.

**Comment 176:** Our neighborhoods should be preserved, landmarks preserved, quality of life preserved, along with respect for the people who have made these neighborhoods their home for decades.

There has to be limits set. Developers are only out for their interest and the return on their investment. Already the high rises in the area are having difficulty filling their apartments. Why do we need more and especially a building of such enormity. (152)

**Response:** This is not a comment on the Draft Scope of Work.

**Comment 177:** If you need any more convincing of how these sky-high apartment towers are ruining Brooklyn, go over to where the Brooklyn Academy of Music, arts destination for residents and tourists, stands in Fort Greene. Once the historical building stood out like a beacon when I walked there to see a film or play. Now it is barely visible from the western side, hidden behind several of the largest and ugliest apartment buildings I've ever seen.

By the way, I've read that one of those ugly buildings is having trouble finding buyers for the luxury apartments and is offering discounts. (124)

**Response:** This is not a comment on the Draft Scope of Work.

**Comment 178:** Task 16 of the DEIS must provide a detailed, comprehensive analysis of the significant impacts of the imposition of the too-tall and too-dense 80 Flatbush development on the neighborhood character and quality of life for residents in historic, low-rise, Boerum Hill—both during construction and once the site is fully operational. This must include a discussion of the following:

- Primary site location in historic Boerum Hill, not Downtown Brooklyn as cleverly marketed by the sponsoring agency, city, local business lobbying organizations and the developer. The southern border of Downtown Brooklyn is Schermerhorn Street, not State Street.
- Inappropriate close proximity to the low-rise historic homes and businesses.
- Unprecedented height, density, and massing of 80 Flatbush, considering existing zoning and the lot shape and borders (including two narrow residential streets). This must include a study of why the site density is

concentrated at these two residential street boundaries, rather than the two commercial ones.

- Aggressive transformation of the skyline in the BAM Cultural District, obliterating view lines to the iconic One Hanson Place. The stubborn insistence that extreme height—which in this case would translate to a tower that would be the 12th tallest building in the City if constructed today—is preferable to other massing configurations is an affront to residents and business owners who invested in this neighborhood when no one else would.
- Lack of setbacks for towers. The current zoning calls for setbacks as an accommodation for higher density on small, irregularly shaped lots. The gratuitous concession of an indentation at the base of the taller tower does not qualify as a proper setback.
- A rational, thoughtful, and unbiased plan for what the development could be as-of-right (32)

This new development at 80 Flatbush threatens to block views of the clock from the west. Views from Brooklyn Heights, Cobble Hill, and Boerum Hill will all be affected. Also, a development of this scale is unsuited in the midst of a brownstone residential neighborhood. Specifically, I am concerned about exceptions to the current zoning requirements which the developer is requesting.

Removing the setback requirements will impact the amount of natural light reaching the street and neighborhood. Eliminating this requirement is unjustified. This lot is not part of Downtown Brooklyn. It borders State Street which is a brownstone street. A development of this scale will forever change both State Street and also residential Boerum Hill and Fort Greene. I am not against development of the site, I just feel the massing proposed is completely unsuitable for brownstone Brooklyn. (19)

The requested exception to the setback requirements would have a detrimental impact upon the entire neighborhood. The simple fact is that building two tall towers on this plot will adversely alter the character of this neighborhood. (71)

**Response:** An assessment of neighborhood character considers several technical areas assessed in an EIS, including urban design and visual resources. Consideration of the proposed project relative to the built scale and form of the buildings within the study area will be assessed. With respect to zoning and land use, the site is located within Downtown Brooklyn. Its current zoning, C6-2 Commercial, allows for commercial or residential development over 500 feet in height. The “Urban Design and Visual Resources” and “Neighborhood Character” sections of the DEIS will assess the effects of the proposed project’s design on the surrounding neighborhoods.

**Comment 179:** First and foremost, the project that is proposed is too big. With a FAR of 18, it massively exceeds the FAR of 6 that is zoned. This might be fine in downtown Brooklyn, or even a few blocks north where the forest of high rises has grown, but it really is too big for this site. It will tower over the brownstone neighborhood

in Boerum Hill with loading docks etc on quiet State Street. It will add to the overcrowding already seen on our roads, subways and green spaces. It will block the historic views of One Hanson Place, which has been seen all over Brooklyn for nearly 100 years. I am pleased to see the school development, but frankly a project of this size will take up all the seats in the new schools and we will be left exactly where we were before, but with an oversized development and 7 years of construction. (147)

**Response:** The proposed project will be assessed in the EIS for its potential effects on zoning, urban design, construction, and public school capacity.

**Comment 180:** I hope that you can see what a bad deal this project is for Boerum Hill. I know the Chamber of Commerce endorses this project since it will increase office space, but we have a tremendous amount of new construction already in progress that will give downtown Brooklyn ample new office space. We also have a huge increase in affordable housing units with all the other projects already in progress. How much is enough? How much density is enough? Do we want to be like Beijing? I know that I do not want to see that happen to New York. I do not want to see bad air quality and overcrowding become the norm. Please consider another alternative to green-lighting this project. We can do better for our children and our community. (121)

**Response:** This is not a comment on the Draft Scope of Work.

**Comment 181:** This development is completely inappropriate for the Boerum Hill neighborhood. I am a homeowner at 180 Dean Street and we have suffered enough overcrowding and building in the last 10 years. (126)

**Response:** This is not a comment on the Draft Scope of Work.

## **CONSTRUCTION**

**Comment 182:** The scope should examine access for Engine 226 down State Street and/or Third Avenue to Flatbush during construction and post construction in anticipation of construction lane closures and school buses on these streets in addition to current traffic load. (9, 81)

Determine the impact of the prolonged construction period on traffic flows and emergency response. (34)

Task 16 of the DEIS must include a discussion of how the neighborhood will survive a protracted (6+ years) and likely after-hours, overnight and weekend construction scenario due to the need to keep the Khalil Gibran School operational (32)

**Response:** As described in the Draft Scope of Work, the DEIS will assess the proposed project's potential impacts during and after construction, including any potential traffic impacts, and develop impact avoidance and mitigation measures where

**Appendix A: Response to Comments on the Draft Scope of Work**

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required and practicable. As part of the proposed project's construction planning, Maintenance and Protection of Traffic (MPT) plans would be developed. Approval of these plans and implementation of the closures would be coordinated with NYCDOT's Construction Mitigation and Coordination (OCMC). The DEIS will include a qualitative discussion of the proposed project's potential effects on emergency response services during construction.

**Comment 183:** During what hours/days of the week will construction take place? (14, 81, 90, 92, 93, 95, 103, 117)

**Response:** The Construction chapter of the DEIS will identify the typical construction hours anticipated for the proposed project.

**Comment 184:** What steps are being taken to ensure the actual construction will be completed safely and with minimal impact on the neighborhood? (71, 113)

Full construction logistics plan needs to be shown for each phase, showing staging and access. (20)

**Response:** The Construction chapter of the DEIS will discuss a variety of measures that would be employed to ensure the safety of the adjacent community during construction of the proposed project. The Construction chapter will provide an overview of the preliminary construction logistics, including potential construction staging areas and site access point(s).

**Comment 185:** The hideous apartment towers will be built quickly while the Khalil Gibran School will wait and wait. (124)

**Response:** Comment noted.

**Comment 186:** Provide an analysis of the following areas pre- and post-construction, using (at minimum) a quarter-mile-radius study area:

- air quality;
- quality of life;
- noise; and
- traffic, which is already a nightmare in this area. I cannot imagine how closed lanes, construction deliveries, work around the clock will contribute. (51, 96, 108)

**Response:** The DEIS will follow *CEQR Technical Manual* guidelines in assessing the potential for the proposed project to result in significant adverse impacts. As described in the Draft Scope of Work and consistent with *CEQR Technical Manual* methodology, for both the construction and post-construction periods, the DEIS will assess the proposed project's potential effects on transportation systems, air quality, and noise and vibration.

**Comment 187:** How will the flow of traffic on the 400 and 300 blocks be affected as each phase is completed? (139)

What will be the impact on traffic (including lane closures) on a temporary basis? (20)

The during-construction scenario will represent another untenable condition: a building of this size will generate significant volumes of worker vehicles and delivery trucks. Past EISs note that such conditions are temporary and thus dismiss potential impacts. Such specious technical approaches thus avoid the unmanageable traffic conditions that are imminent. (32)

Will these construction trucks and vehicles be accessing site via State St.? Will such trucks as large cement trucks be lining up on State St.? Consider where construction workers will park, take breaks, eat lunch during build. This has added unwanted loitering on State St. with past construction. (139)

**Response:** As described in the Draft Scope of Work and consistent with *CEQR Technical Manual* methodology, the construction impact assessment will assess the effects of the proposed project's construction on traffic and identify the increase in vehicle trips from construction workers and equipment. As part of the proposed projects' construction planning, MPT plans would be developed. Approval of these plans and implementation of the closures would be coordinated with the NYCDOT's OCMC. The Construction chapter will provide an overview of the preliminary construction logistics, including potential construction staging areas and site access point(s).

**Comment 188:** Analyze the impact on street parking during construction and post-completion. (34)

**Response:** As described in the Draft Scope of Work, the DEIS will consider the proposed project's potential effects on parking, during and after construction.

**Comment 189:** As we in the 400 block have already spent over three years with the construction noise of The Hub on Schermerhorn, a detailed noise study is essential. Include not only the noise from the build but demo of site, traffic noise of trucks to and from site. (139)

**Response:** As described in the Draft Scope of Work, a detailed construction noise analysis will be prepared to examine potential noise effects due the proposed project's construction-related activities, including noise from construction equipment operation and from construction vehicles and delivery vehicles traveling to and from the project site.

**Comment 190:** 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. (89)

**Response:** The DEIS will follow *CEQR Technical Manual* guidelines in assessing the potential for significant adverse construction impacts. As described in the Draft Scope of Work and consistent with *CEQR Technical Manual* methodology, the construction impact assessment will evaluate the duration and severity of the disruption from the proposed project's construction activities. Technical areas to be assessed will include transportation systems, air quality, and noise and vibration.

**Comment 191:** I would also like you to study the impact on our homes and quality of life that a project of this size will have with specific focus on, most importantly, noise. It is my understanding that many after hour variances will be needed for this project since Khalil Gibran will remain open during construction. I certainly do not want to see the children of Khalil Gibran negatively impacted due to the high level of noise this project will cause. But what about our children and their quality of sleep? How are our children going to be prepared for their school day if intense amounts of incessant noise drone on night after night? Are you going to take this into account? Are the children of Khalil Gibran more important than our children? When The Hub building was constructed, and it is a good 20 stories smaller, our family experienced many an early morning awoken by noise created due to the issuance of after hour variances this project received from the city. If Alloy must do most of its work primarily after hours the impact on our quality of life will be unendurable. Please study what the real effect of construction and staging on the residents of State Street, Flatbush, Schermerhorn, Atlantic and all other surrounding blocks that will hear the late night pounding. If we are forced to move out of our home during the building of the 74 story tower, will the city be willing to compensate us for the expense? If our child suffers mentally from sleepless nights due to constant noise, will the city take responsibility for his injuries? Please take this all into account. (121)

**Response:** The DEIS will provide an analysis of the proposed project's potential for construction-period noise impacts. The DEIS will also provide information on the project's preliminary construction plan and elements to be incorporated into this plan.

**Comment 192:** The DEIS must include:

- An exhaustive analysis of noise impacts on the local community, considering the extreme proximity and probable timing of construction activities with an estimated duration of 6+ years
- An in-depth analysis of vibration impacts on adjacent structures and fragile, aging infrastructure such as water and sewer systems, as well as other underground utilities.

- A detailed analysis of vibration impacts on adjacent infrastructure: aging Catskill water mains and ancillary equipment, roadways (prone to buckling and sinkholes on State Street), sewer systems, and other underground utilities. (32)

**Response:** The DEIS will follow *CEQR Technical Manual* guidelines in assessing the potential for the proposed project to result in significant adverse impacts. As described in the Draft Scope of Work, a detailed construction noise analysis will be prepared to examine potential noise effects due the proposed project's construction-related activities. A construction vibration assessment will also be performed. In accordance with the *CEQR Technical Manual*, the vibration assessment will assess the potential for various pieces of equipment to cause damage or annoyance to nearby buildings.

**Comment 193:** Conducting construction for a new school directly next to the current Khalil Gibran International Academy building could be tremendously distracting for the students throughout the school year. Significant thought and attention should be given to how and when construction should take place. School holidays and vacation periods should be maximized for construction periods to reduce the disturbance that nearby construction will undoubtedly have on the students at the high school.

We reiterate the need for construction noise to be at a minimum during school hours and for construction to be limited to weekdays. (2)

Research shows noise (such as construction noise) can have a severe adverse impact on students' ability to learn. (14, 81, 117)

The scope should include impacts of construction noise on the students in the Khalil Gibran School, which will be operating throughout the construction period in both its existing and new location. (36, 71)

**Response:** The DEIS will provide the anticipated construction schedule and information on the project's construction plan and elements to be incorporated into this plan. As described in the Draft Scope of Work, a detailed construction noise analysis will be prepared to examine potential noise effects due the proposed project's construction-related activities. During the most representative worst-case time periods, noise levels due to construction of the proposed projects will be predicted for each sensitive receptor, including the Khalil Gibran School.

**Comment 194:** The scope should include an assessment of the safety of students during construction and finally in the new schools in the midst of a heavy traffic zone. (36)

**Response:** The Construction chapter of the DEIS will discuss a variety of measures that would be employed during construction of the proposed project to ensure the safety of the children, teachers, administrative personnel and the public near the project site.

**Comment 195:** 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 analyzed. (89)

**Response:** The DEIS will assess the proposed project's construction-related activities and their potential impacts on noise and air quality in accordance with *CEQR Technical Manual* guidelines.

**Comment 196:** The Construction Impact Assessment must examine, for the entire construction and commissioning period, the impacts of likely night and/or overnight construction and related operations (relating to the necessity of keeping the existing and future Khalil Gibran School operational) on the surrounding residential and business community. This must include:

- Financial impacts on the many small landlords in the neighborhood who may be unable to consistently lease their rental properties during this period.
- Financial impacts on residents who may have to temporarily relocate due to adverse noise and vibration impacts.
- Wellness and mental health impacts on residents subjected to long-periods of night construction, especially considering the at-risk population housed in a portion of the YWCA. (32)

Analyze the impact of construction noise on the mental health of residents. Note that E-Designations protect ONLY the people being housed in the development. (34)

**Response:** Permissible construction hours in accordance with New York City laws and regulations are from 7 AM to 6 PM on weekdays. Appropriate work permits from DOB would be obtained for any necessary work outside of normal construction and no work outside of normal construction hours would be performed unless such permits are obtained. The DEIS will follow *CEQR Technical Manual* guidelines in assessing the potential for the proposed project to result in significant adverse impacts. Technical areas to be assessed or potential construction impacts will include socioeconomic conditions, noise and vibration. As noted in the Draft Scope of Work, according to the *CEQR Technical Manual*, a public health analysis is not warranted if a project does not result in a significant unmitigated adverse impact in other CEQR analysis areas, such as air quality, water quality, hazardous materials, or noise. If an unmitigated significant adverse impact is identified in the relevant technical areas of the DEIS, a public health analysis will be performed.

**Comment 197:** Provide new soundproof windows to those buildings facing the construction site. (127)

**Response:** As described in the Draft Scope of Work, a detailed construction noise analysis will be prepared to examine potential noise effects due the proposed project's construction-related activities. Based on the results of the construction noise

analysis, if necessary, the feasibility, practicability, and effectiveness of implementing measures to mitigate significant construction noise impacts will be examined.

**Comment 198:** I would also like you to study the impact on our homes and quality of life that a project of this size will have, with specific focus on vibration during the construction phase, increase in rodent infestations and harmful dust and debris. (51, 121)

**Response:** The DEIS will include an assessment of construction-related activities, including vibration and dust monitoring, and identify strategies to reduce the presence of rodent and vermin population at the site.

**Comment 199:** The scope should include construction impacts from vibration of heavy commercial vehicles on vulnerable 19th brownstones in a half-mile radius. (36)

Many of the buildings across the street and on other streets nearby, including my own, are civil war era buildings, meaning their structure is significantly old. My own building has a wood structure that likely cannot withstand large vibrations coming from nearby construction. Any blasting or the installation of piles for foundations, which I imagine will be necessary for this skyscraper of a building, would have a significant negative impact on the structure of the surrounding buildings. I would like the impact of this development's construction on the structure of the surrounding buildings, particularly those that have civil war era wood structures, to be thoroughly studied. (84)

Vibrations from construction jack hammers and large trucks would very likely damage existing historic houses. Thorough vibration studies must be undertaken. (89)

What measures will be taken to ensure the construction of such a large-scale project in a residential neighborhood does not inflict damage on the historic brownstones on State Street as well as the landmarked Williamsburg Savings Bank tower across the street? If damage is incurred, what compensation is Alloy prepared to offer area residents? (14, 81, 90, 92, 93, 95, 103, 117, 127)

At a minimum, the developer must be required to:

- Develop a formal Vibration Monitoring and Control Plan.
- Perform precondition surveys at sensitive receptors, including adjacent residential structures with fragile, ornate interior plasterwork, to document existing conditions.

Install vibration-monitoring devices along the residential thoroughfares to insure the safety and security of residents and the protection of their historic properties. (32)

**Response:** The DEIS will consider vibrations from equipment and will provide an analysis of the proposed project's potential for construction-period impacts in the areas of

transportation, air quality, noise, hazardous materials, historic and cultural resources, and other technical areas. The DEIS will also provide the anticipated construction schedule and information on the project's construction plan and elements to be incorporated into this plan.

**Comment 200:** What is Alloy going to do to minimize the impact on the community of this project during an 8-year construction and demolition timeline? There are many other aspects of the development that should be studied including the impacts of construction dangers during a six-to-eight year build-out with cranes, airborne pollutants, and noise. What compensation will be given to the neighborhood if the project goes over the projected timeline or fails in the middle? (14, 52, 79, 81, 86, 90, 92, 93, 95, 101, 103, 117, 149)

We are worried that construction may not be completed for many years if the market takes a bad turn. Then we will be faced with a vacant lot for many years to come. (37)

**Response:** The DEIS will consider these recommendations and will provide an analysis of the proposed project's potential for construction-period impacts in the areas of transportation, air quality, noise, hazardous materials, historic and cultural resources, and other technical areas, and will describe measures to mitigate any significant adverse impact. The DEIS will also provide the anticipated construction schedule and information on the project's construction plan and elements to be incorporated into this plan. Construction staging will be designed to minimize interference with pedestrians and nearby residences.

**Comment 201:** The EIS must identify with precision the steps to be taken to mitigate construction dust and debris. (2)

What steps will be undertaken to reduce dust during construction? (9, 51)

Concerns about construction dust and soil contaminants that can be disrupted over an 8-year construction project. (14, 81, 117)

**Response:** The DEIS will follow *CEQR Technical Manual* methodology regarding the analyses of construction impacts, which include the assessment of air quality. As described in the Draft Scope of Work, the construction analysis will identify project-specific control strategies such as dust control measures to minimize the air quality effects of the proposed project's construction-related activities.

**Comment 202:** Since the school cannot be disrupted, how will drilling be done so as not to disturb residents? If the goal is to keep the Khalil Gibran school open during the entire project, will that push construction hours to nights and weekends, further disrupting the residential neighborhoods? (9, 14, 81, 90, 92, 93, 95, 103, 117, 127, 142, 145, 153)

**Response:** The DEIS will analyze construction-related noise impacts, including any potential drilling operations. The Construction chapter of the EIS will identify the typical construction hours anticipated for the proposed project.

**Comment 203:** What will be the effects of trucks, materials, and cranes impacts on the 500 block of State Street and all of Boerum Hill during the long demolition and construction processes? (87, 101)

Where will crane(s) and other equipment be located during construction? (20)

Location of construction cranes, and concerns over damage due to construction, deliveries of materials, scaffolding protection. (51)

**Response:** The EIS will follow *CEQR Technical Manual* guidelines in assessing the potential for the proposed project to result in significant adverse impact and will provide a construction analysis in the areas of transportation, air quality, noise, hazardous materials, historic and cultural resources, and other technical areas. The DEIS will also provide information on the project's preliminary construction logistics plan, including potential locations of construction staging areas and construction site access points.

**Comment 204:** Task 17 of the DEIS should provide an analysis of the ability of the development team to handle all aspects of this complicated and controversial endeavor. (32)

Alloy does not have the experience to be building towers of this size and nature. It isn't even close. Their portfolio consists of smaller condo buildings. I am terrified that Alloy will break ground on a project that will take many years to complete with countless delays, if it is in fact, completed at all. (85)

Given the project size and Alloy's development experience I also have serious doubts that Alloy has the ability to deliver on their proposed project and therefore would ultimately jeopardize ECF's mission to create more public school space.

Alloy LLC has never designed a 74-story tower or even a 38-story tower that was eventually built. They have also never supervised a construction site that would encompass 61,399 square feet on the ground floor and 986 feet up in the air. Alloy has also never managed 922 residential rental units and I don't believe they have worked with the city on handling MIH units. They have also never managed 430,000 gsf of commercial/school/retail space as listed in the scope of work.

Alloy is simply too small of a design firm and the scope of work as described is too big for them to handle. (35)

What are Alloy LLC's qualifications to build a project of this scale?

How will a 14-person firm complete a project with more floors than the Freedom Tower?

What happens if the project fails or goes bankrupt mid-stream? What is the contingency plan to ensure it won't be left as an incomplete construction site with no new schools as promised? (14, 81, 117)

The developer has not demonstrated expertise/ability to complete an enormous project. My concern is that the project will become poorly managed, cut corners to finish, or never be completed on time (leading to all the negative neighborhood conditions associated with unfinished projects). A solution would be to reduce the size of the building(s) considerably. (79)

The developer's portfolio small and does not include previous projects on the same scale as the proposed project, which directly translates to a real risk that the relative inexperience will lead to construction delays or even project failure. (67)

There is no evidence demonstrating Alloy is even remotely qualified to take on such an extraordinary construction project. (22, 98, 131, 153)

**Response:** This is not a comment on the Draft Scope of Work. ECF began to explore the redevelopment of the existing Khalil Gibran facility (362 Schermerhorn) in 2015. After extensive conversations with the school's principal and local stakeholders, ECF issued a Request for Expressions of Interest (RFEI) to the real estate development community soliciting interest in redeveloping the property. ECF received proposals from qualified bidders and ultimately selected Alloy based on the merits of its proposal, factoring in experience, capacity, and financial offer.

**Comment 205:** There appears to be no plan to conduct a quantitative assessment of construction-related air quality. Only a detailed qualitative assessment is proposed. However, the *CEQR Technical Manual* calls for the consideration of a quantitative detailed analysis when: 1) the construction duration would be greater than two years, 2) the project would be located near sensitive receptors, and 3) the project would involve two phases with the construction of multiple buildings where receptors would exist on buildings already completed; 80 Flatbush meets these criteria. If it is assumed that project-specific control measures will be used to significantly mitigate impacts, this should be clearly stated. (32)

**Response:** In addition to the factors listed above, the *CEQR Technical Manual* states that the need for a quantified air quality analysis shall also be determined based on the types of construction equipment used, the relationship to nearby sensitive receptors, the type of construction activity and the nature and extent of any commitment to use Best Available Technologies for construction equipment. In accordance with the *CEQR Technical Manual* and as described in the Draft Scope of Work, the construction air quality analysis will review the projected activity and equipment in the context of intensity, duration, and location of emissions relative to nearby sensitive locations. Project-specific control measures will be identified and implemented to the extent practicable during construction to ensure that significant impacts on construction do not occur.

**Comment 206:** What steps is Alloy planning to take to mitigate construction noise, dust and other pollution that may be harmful to students, residents, tourists, etc. (14, 81, 90, 92, 93, 95, 103, 117)

**Response:** The EIS will follow *CEQR Technical Manual* methodology regarding the analyses of construction impacts, which include the assessment of air quality and noise, and identify measures that will be implemented to the extent practicable to minimize the effects from the proposed project's construction.

**Comment 207:** What provisions will be made for existing residents to weather the new noise issues associated with a prolonged construction period and thousands of new residents within a single block? (34)

How are you going to tear down those buildings quietly? (113)

**Response:** The EIS will follow *CEQR Technical Manual* methodology regarding the analyses of construction impacts, which include the assessment of noise, and identify measures that will be implemented to the extent practicable to minimize the noise effects from the proposed project's construction.

**Comment 208:** How can the health of the 500 State Street block and other nearby residents be ensured from the airborne potential health hazards that the demolition phase and then construction phase could produce? The buildings being demolished seem old and I fear how their contents/materials will impact my family's health when we have that demolition dust and air get onto our block and potentially into our homes (we are only 60 feet away!)? (101)

**Response:** The DEIS will follow *CEQR Technical Manual* methodology regarding the analyses of construction impacts, which include the assessment of air quality. Project-specific control measures will be identified in the EIS and implemented to the extent practicable during construction to ensure that significant impacts on construction do not occur.

**Comment 209:** What will be done to protect the [YWCA] building from the effects of construction-related occurrences such as blasting, falling debris, drilling noise, and utility line damage? (12)

**Response:** The DEIS will describe generally applicable construction requirements as well as project-specific control measures that will be identified in the EIS and implemented to the extent practicable during construction to minimize the effects from the proposed project's construction.

**Comment 210:** Small Landowners: Indirect Business Displacement — The protracted construction period, with a strong probability of after-hours construction (noise, vibration, dust, inconvenience) and traffic disruptions (trucks, emergency responders, lack of parking) will likely impact the ability of the numerous small landlords and developers in the area to consistently lease their properties.

The ability of property owners to sell their holdings will surely be impacted as well, at least during the uncharacteristically long construction period envisioned for this two-phase development.

Moreover, there will be no tax relief for these homeowners, landlords, and developers, thereby adding to their financial burden. (32)

**Response:** As discussed in the scope, the DEIS will include a chapter assessing the potential effects of construction activities and potential construction-related impacts on the surrounding area.

### **ALTERNATIVES**

**Comment 211:** The promise for a new building for Khalil Gibran International Academy seems to be the argument for the project. Since Khalil Gibran International Academy is a high school with students from throughout the borough and possibly beyond, a new building for Khalil Gibran International Academy does not have to be in the current site. Why can't SCA look for an appropriate site in other communities in Brooklyn near transportation? We support that the students need a 21st century school, but it doesn't need to be at this site. (53)

The developers are trying to sweeten the pot and get their predatory approvals by providing space for the Khalil Gibran International Academy and a 350 seat elementary school. I say both of these schools can find other locations. There are plenty of unused or underused buildings in downtown Brooklyn, some of which have already been turned into charter schools. (148a)

A building of the size of 80 Flatbush should have to invest in more schools than planned. (68)

The proposal authors present their project as a gift to the area, bestowing on us so much that we don't already have. Not a gift in our view. Yes, the Khalil Gibran HS site is ridiculously labyrinthine and another site should be found for the school. One can imagine other solutions. The proposal sells the project as though it were the only way to address this need. (47)

The city certainly has the budget to upgrade the school without this undue burden on the community. Even an over-build for the school would be preferable to the 80 Flatbush scheme. (32)

The proposal considers only two scenarios: the project vs the No Action condition. This seems unimaginative at best. We in Boerum Hill would like to see other scenarios that can preserve our neighborhood while also addressing the needs of the school. (47)

Study needs to include more than just the "no action" alternative. Should include, but not limited to, alternative redevelopment proposals, alternate massing site plan/ footprint, heights; redevelopment under existing zoning; redevelopment under current use. (20)

Consider reducing the commercial and residential uses and making the schools larger within the envelope of the building. What is the overall effect on the development of increasing the number of classroom seats and decreasing the amount of market-rate space? (taking into account that the bigger the school, the more rent the owner gets) (96)

Perhaps the developer should be asked to present an alternate proposal where all the high-rise portions of the site are on the Schermerhorn Street side of the site, i.e. closer to downtown Brooklyn. That way the low-rise brownstone character of State Street would not be so significantly compromised and One Hanson's clock would also be more visible from the West. (66)

During preliminary presentations of "80 Flatbush," several people have asked to see what could be developed on the block bounded by Schermerhorn Street, Flatbush Avenue, State Street and 3rd Avenue without a zoning change. I encourage ECF and its consultants to include that scenario as one of the alternatives examined in the DEIS. (3)

Please reassess this site for a more relevant development! (147) Perhaps instead of the current proposal, the developer could build one or two smaller buildings on the Schermerhorn side of the lot and keep the State street side of the street low rise to match the character of the brownstone street? This would help create a better transition between downtown Brooklyn and Boerum Hill. There will also be less obstruction of One Hanson's clock. (19)

I'm in favor of just converting the entire site to a school. Brooklyn Tech High School down the street seats 5,000 kids in one building. Why can't we just convert this block in the neighborhood into a school complex. ECF doesn't need Alloy's proposal. We should be getting Alloy to sell their share of the block and so DOE can finally build the schools they so much need. (35)

The school can be properly sited without tying it to this development. (126)

There is no doubt that this block could be put to better use. A brand new school, retail offices and apartments is definitely a good idea. I am not against progress at all. I have benefited from the market by seeing my property value increase significantly and understand that I may be inconvenienced in the short time by construction. But this proposal far exceeds what is viable for that particular space. I implore you to please reconsider this proposal and to downsize it accordingly. (37)

The proposed school could be located elsewhere. (22, 82, 149)

**Response:**

Under CEQR and SEQRA regulations, the DEIS is required to identify feasible alternative programs that can reduce or eliminate significant adverse impacts of a proposed project while substantially meeting the purpose and need of the proposed project. Alternative scenarios will be evaluated in the DEIS, including a No Action alternative and a No Unmitigated Impacts alternative that considers

**Appendix A: Response to Comments on the Draft Scope of Work**

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a project program that would eliminate the proposed project's unmitigated significant adverse impacts.

**Comment 212:** I recommend that we go for a No Build plan and that Khalil Gibran International Academy be refurbished and brought up to snuff by not giving away tax dollars. (42, 121)

**Response:** Comment noted.

**Comment 213:** Too often high impact development is marketed as primarily about community needs and benefits which are rarely, if ever, delivered to the extent in the approved plans. I would very much like to see a report on delivery of promised benefits of jobs and affordable housing of the Barclays Center development. (36)

**Response:** This request is not within the scope of a SEQRA/CEQR impact analysis.

**Comment 214:** The residents of Brooklyn can only hope that our elected officials will genuinely assess our needs and benefits and require that the existing proposal by Alloy Development be substantially altered and scaled down. (36)

The size and density of the development must be scaled down in order not to overwhelm the rest of the neighborhood. (25, 40, 49, 56, 72, 88, 105, 118, 128, 129)

**Response:** Comment noted.

**Comment 215:** Can the duration of the project construction be shortened by reducing the ambitious scope? (101)

**Response:** The Alternative chapter of the DEIS will evaluate alternatives and their construction-related activities in accordance with CEQR regulations.

**Comment 216:** There is insufficient data revealed about the costs to the public of the subsidies for the project—the cost/benefit ratio. Other and possibly more economical supports via alternative options are being offered to us. (114)

**Response:** This is not a comment on the Draft Scope of Work.

**Comment 217:** The statement should show costs/benefits for a project built "as of right" without government support, "as of right" with customary J-51 and inclusionary program discounts, and also for a project built with a lower FAR than the proposed FAR18. (59)

**Response:** A "No Action" alternative will be studied in the EIS and will study an as-of-right development project.

**MISCELLANEOUS COMMENTS**

**Comment 218:** Include a restaurant in the retail segment of the building. (127)

**ECF 80 Flatbush Avenue**

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**Response:** Comment noted.

**Comment 219:** Incorporating the historic buildings in the overall ensemble results in a better project. (6)

**Response:** Comment noted.

**Comment 220:** The project for the development of 80 Flatbush Avenue is a welcome addition to Downtown Brooklyn bringing much needed affordable residential units, office space, as well as additional school seats to the area. The floor plates (10,000 SF leasable) are well sized for the small and mid-size tenants we see in the market today. The project's mixed-use nature will be attractive to businesses and make for a vibrant addition to the Downtown Brooklyn streetscape. With the delivery of significant public benefits, a strong architectural expression, and a unique mix of uses, 80 Flatbush is a home-run project that the Brooklyn Chamber strongly supports. (8)

**Response:** Comment noted.

**Comment 221:** The intersection of Atlantic and Flatbush Avenues has a history of high density development with the extensive access to transit especially along Flatbush Avenue and Atlantic Center. The site's proximity to Manhattan and easy access to the rest of the borough is not only attractive to residents but to companies and businesses of various sizes. There's a huge opportunity here for smaller companies and starts ups to take advantage of the commercial space planned as part of this proposed project. The site also proposes a tremendous amount of public benefit including for the much needed rebuild of the Khalil Gibran International Academy, construction of a new 350- seat school to the district, as well as, approximately 225 affordable units of affordable housing. And finally we commend the reuse of the two existing historic structures and the thought that's been given to this site that delicately balances this location on Flatbush Avenue with carefully designed setbacks for 3rd Avenue and State Street. We believe that 80 Flatbush can serve as an exciting southern entryway to Downtown Brooklyn. (5)

**Response:** Comment noted.

**Comment 222:** Khalil Gibran International Academy is currently facing serious limitations with its current facility. These limitations are not conducive to providing an optimal learning environment for students and have prevented the growth of enrollment that our community needs. The school lacks essential facilities like a gym, auditorium, or an assembly space, preventing youth from participating in school-based sports or all school activities. The hallways are narrow, the classrooms are small, and the bathrooms are inadequate. The building electrical system is severely undersized. The heating and cooling system is not adequate and the building is not ADA accessible. The 80 Flatbush project presents an opportunity

for a new beginning for the school's students and faculty. The project would create new state of the art high school facility that would solve many of the noted issues. (4, 7)

**Response:** Comment noted.

**Comment 223:** To the extent that the two towers would consist of southern facing façades that are extensively glazed, an analysis should be conducted to disclose any impacts pertaining to excessive glare. (1)

I ask that the EIS address the following additional issues: glare, wind and shadows. (71)

Unmentioned by the proposal authors is the issue of glare. On Pacific Street we need to close our shutters at certain times of year to "mitigate" the blinding flashes of intense light bouncing off of 333 Schermerhorn. Cast shadow is a problem, but also glare. This would have to be addressed for any building that would rise higher than the present streetscape (yes, even 10 stories). (47)

In addition to shadow studies, reflection studies are very important. All of these new glass edifices bounce back a substantial amount of solar radiation all over their southern neighbors, greatly raising the temperatures and causing increased energy demands. Not fair to increase the burden on these smaller homes and their families. (51)

As many units in 457 State Street will be affected by glare (457 State St. eastern side of building is directly facing proposed build), include reflection from glass windows in the scoping study. (139)

The EIS needs to assess glare from glass tower. (132, 50)

Glare from the buildings must be included in studies. (89)

The impact study needs to include assessment of the potential impact of glare from glass towers affect light, heating, cooling, etc., of nearby residences. (14, 117)

An accurate analysis of increased glare due to reflection from glass exterior walls, and effect on ambient temperature in the surrounding area must be included. (20)

**Response:** Reflectivity or glare studies are not considered or required under CEQR. The building is still in preliminary design and details of the building materials have not yet been selected, but the design team will note concerns related to glare. As stated in Task 6, "Shadows," of the Draft Scope, the DEIS will assess the proposed project's shadow effects on nearby sun-sensitive resources and public open spaces. As noted in response to Comment 71, an analysis of wind conditions and its effect on pedestrian level safety is not warranted under CEQR.

**Comment 224:** 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 high rise and

other new multiple dwellings added to my block [30-30 Thomson Avenue] 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? (27)

**Response:** The calculation of operational energy consumption will be undertaken in the DEIS. Analysis of the adjacent ConEd infrastructure is outside the scope of the SEQRA/CEQR impact assessment.

**Comment 225:** I would also like to know how many bird strikes are predicted for the tower, considering the materials used, and whether bird strikes can be mitigated? (69)

**Response:** Bird strikes can be minimized by a reduction in reflective surfaces. As discussed above in response to Comment 223, the building is still in preliminary design and details of the building materials have not yet been selected but the design team will note concerns related to minimizing the potential for bird strikes.

**Comment 226:** Nightlight light pollution: is there a study of its effects on the immediate area (i.e., at minimum, a quarter-mile-radius study area)? (51)

**Response:** It is not anticipated that the project would result in conditions that will result in higher light pollution than would be experienced with other developments; therefore, this analysis is not warranted. Light pollution is not considered or required under CEQR.

#### *WIND IMPACTS*

**Comment 227:** The scope should include an analysis of an already windy area and potential whistling from tall buildings that will result from the proposed project. (9, 13, 34, 38, 50, 51, 69, 80, 81, 86, 89, 90, 92, 93, 95, 103, 96, 101, 132, 139)

The impact study needs to include an assessment of the potential impact of the change in wind patterns and potential impact on the surrounding neighborhood. (14, 117)

A wind study must be included showing effect of taller building on wind patterns at the street level. (20)

**Response:** As noted in response to Comment 70, the proposed project is not located in an area that typically experiences high wind conditions (i.e., a waterfront location) and the proposed project’s layout and massing would not create canyon-like designs such that it may result in significant wind issues. Thus, an analysis of wind conditions and its effect on pedestrian level safety is not warranted under CEQR.

**Appendix A: Response to Comments on the Draft Scope of Work**

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**Comment 228:** I would ask that this study include a review of the effects of the tower and its surrounding buildings on wind noise and reflections. (13, Armbuster\_080, 61)

**Response:** The EIS will qualitatively address the potential for the building structures to result in noise at surrounding receptors. As noted in response to Comment 223, the building is still in preliminary design and details of the building materials have not yet been selected but the design team will note concerns related to minimizing the potential for glare.

**Comment 229:** We believe the public has the right to know the total cost of construction, expected profits and clear disclosures of State and City support via tax abatements or infrastructure costs as a related to this development. (9, 137)

**Response:** This is not a comment on the Draft Scope of Work.

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**Appendix B**  
**Written Comments**



OFFICE OF THE BROOKLYN BOROUGH PRESIDENT

**ERIC L. ADAMS**  
President  
July 10, 2017

Ms. Jennifer Maldonado  
Executive Director  
New York City Educational Construction Fund  
30-30 Thomson Avenue, Fourth Floor  
Long Island City, NY 11101

19 JUL 14 2017

Re: The proposed scope of work for the Draft Environmental Impact Statement for 80 Flatbush Avenue

Dear Ms. Maldonado:

I am writing to submit comments in response to the proposed scope of work for the Draft Environmental Impact Statement (DEIS) for 80 Flatbush Avenue.

Enclosed are my formal comments on the Draft Scope of Work. These comments take into consideration matters pertaining to child care centers, glare, indirect residential displacement, and the extent of study areas for specific tasks such as school utilization and the adequacy of open space.

As the proposal moves forward through the Uniform Land Use Review Procedure (ULURP) process, I expect there will be nearby residents who may voice concerns regarding the proposed density and height of the proposed development. The DEIS might shed thoughtful consideration of such concerns.

If there are any questions, please feel free to contact Richard Bearak, director of land use for the Office of the Brooklyn Borough President, at (718) 802-4057.

Thank you for your consideration.

Sincerely,

Eric L. Adams

Enc.

cc: Shirley MacRae, chair, Brooklyn Community Board 2 (CB 2)  
Winston Von Engel, Brooklyn office director, New York City Department of City Planning (DCP)

ELA/rb

**Comments of Brooklyn Borough President Eric L. Adams  
In Response to the Proposed Scope of Work for the  
Draft Environmental Impact Statement (DEIS) for 80 Flatbush Avenue**

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**C. SCOPE OF WORK**

**Task 1. Project Description**

No Comment

**Task 2. Land Use, Zoning, and Public Policy**

In lieu of the standard 400-foot radius, for certain tasks, the study area should be expanded. The list of other projects expected to be built that would be completed before or concurrent with the project should be based on specific tasks that warranted an expanded study area.

**Task 3. Socioeconomic Conditions**

**Indirect Residential Displacement**

Step 3 comes into consideration when Step 2 discloses that the study area has already experienced a readily observable trend toward increasing rents. Step 3 would then seek to disclose the likely effect of the action on such a trend. For Step 3, it is appropriate for study area characteristics to include estimates of the number of housing units governed by rent protection measures that are in buildings with significant unused residential floor area. Step 3 should also then identify the number of housing units with a gap between the rent pursuant to a lease and the legally permitted regulatory rent. Such underdeveloped property often is referred to as a “soft site.” In this context, a soft site is a property deemed to be attractive enough as a development site based on the extent of the built floor area in comparison to the permitted floor area. Additionally, a property may be considered a soft site if it contains residential units with a significant gap between charged rent and the legally permitted regulatory rent.

A site developed along Fourth Avenue in Park Slope is one known example in which an under-built site with rent-stabilized tenants was vacated for the purpose of demolishing the multi-unit building. This demonstrates that it is reasonable to account for rent-stabilized buildings where zoning floor area utilization is less than half of the permitted floor area because being stabilized is not a legal deterrent to preclude lawful demolition.

Section 9 NYCRR 2524.5 of the Rent Stabilization Code allows an owner of a rent-stabilized building to not renew the lease of a rent-stabilized tenant on the grounds that the owner intends to demolish the building. Approval from New York State Division of Housing and Community Renewal (DHCR) is subject to approved plans for future development as well as proof of financial ability to complete the project. The property owner must also agree to pay tenant relocation expenses and a stipend, in accordance with established formulas. This strategy was well-publicized at a June 2016 real estate summit in Brooklyn.

In addition, such rent-stabilized apartments might include tenants who pay legally permitted regulatory rents (preferential rents). This results in a substantial gap between

tenants' expiring leases and allowable rents that might be sought by landlords as part of a lease renewal, according to the legally permitted amount. Such significant increase in rents would increase rent burden and might result in residential displacement.

Therefore, documentation of underdeveloped rent-stabilized buildings, as well as rent-stabilized buildings where gaps exist between rents pursuant to a lease and legally permitted regulatory rents, should be accounted for in developing assumptions for the possibilities of induced indirect displacement should the outcome of Step 2 lead to implementation of Step 3.

#### **Task 4. Community Facilities and Services**

##### **Public Schools**

The analysis should be expanded to include the entire zone of properties districted for The Pacific School Public School 38 toward identifying other projects expected to be built that would be completed before or concurrent with the project that would impact future utilization of the school.

##### **Publicly Funded Child Care**

Per the second bulleted task, the description of each publicly funded group child care facility pertaining to existing child care centers should note whether the location is City-owned or leased (including the number of years remaining on the lease), the year and extent of capital improvements, as well as available floor area.

#### **Task 5. Open Space**

An additional task should be undertaken for the open space assessment conducted for the Sixteen Sycamores Playground. Specifically, this task should determine the adequacy of the Sixteen Sycamores Playground as an open space through the identification of other projects expected to be built that would be completed before or concurrent with the project that would impact future utilization of the playground. Contributing buildings should be screened for two criteria when this playground is the nearest open space. One screening should be for buildings that contribute worker population as potential playground users for passive recreational activity within one quarter mile of the playground. The other screening should be for buildings that contribute residential population that might also include active recreational activity within one half mile of the playground.

#### **Task 6. Shadows**

No Comment

#### **Task 7. Historic and Cultural Resources**

No Comment

#### **Task 8. Urban Design and Visual Resources**

No Comment

**Task 9. Hazardous Materials**

To the extent that the two towers would consist of southern facing façades that are extensively glazed, an analysis should be conducted to disclose any impacts pertaining to excessive glare.

**Task 10. Water and Sewer Infrastructure**

Per the seventh bulleted task, the assessment for a stormwater best management practice (BMP) concept plan should include an assessment based on maximizing the utilization of blue roofs.

**Task 11. Transportation**

No Comment

**Task 12. Air Quality**

No Comment

**Task 13. Greenhouse Gas Emissions and Climate Change**

No Comment

**Task 14. Noise**

No Comment

**Task 15. Public Health**

No Comment

**Task 16. Neighborhood Character**

No Comment

**Task 17. Construction**

No Comment

**Task 18. Mitigation**

No Comment

**Task 19. Alternatives**

No Comment



July 28, 2017

Via email and first class mail to: [KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)

Jennifer Maldonado, Executive Director  
New York City Educational Construction Fund  
30-30 Thompson Avenue, 4<sup>th</sup> Floor  
Long Island City, NY 11101

RE: 80 Flatbush Avenue, Brooklyn, NY; SEQR/CEQR No. 17ECF001K

Dear Ms. Maldonado:

We write to comment on the Draft Scope of Work for the Preparation of an Environmental Impact Statement (EIS) for the development proposed for 80 Flatbush Avenue, Brooklyn, NY. The proposed development is overwhelmingly commercial in nature and historically large (including proposing an unprecedented FAR of 18). **Located in an already densely built and highly congested area adjacent to the “crossroads of Brooklyn,” its impacts will likely be great, hence we believe that the EIS process must be as thorough, comprehensive, and inclusive of community stakeholders as possible.**

In addition, we request that a thorough and transparent disclosure be made of the following information: (a) terms of the lease of city-owned land to the developer; (b) the cost of tax-exempt bonds, and every other city or state subsidy, include tax abatements for this project; and (c) where the RFP response of Alloy can be found.

**Project Site and Study Area:** The Draft Scope of Work indicates that a proposed study area radius of 400 feet from the site at 80 Flatbush will be used. We believe that is entirely too small a study area. The study area must be expanded in order to have a legitimate and contextual understanding of the effects on Downtown Brooklyn and the residential neighborhood of Boerum Hill. Expanding the study area to at least one (1) square mile would allow the developers to assess, account for and mitigate other factors that may well impact the development. This includes housing, traffic, transit overcrowding, public safety, population demographics and other jurisdictional issues, such as the proximity of the site to school District 13, which is also over-capacity in the vicinity and which has many additional units of housing under construction and on deck.

Below we discuss particular issues as they relate to specific EIS tasks to be performed.

#### Task 1: Project Description

The project is described in the Draft Scope of Work with emphasis on the creation of two schools, a new public elementary school and the replacement and expansion of the Khalil Gibran International Academy, a high school. However, the proposed school construction constitutes less than 15% of the

proposed development. Thus, it is far more appropriate to characterize this mixed-use, commercial and residential development with a small element of educational space as such.

No one doubts that the Khalil Gibran International Academy is in desperate need of renovation and that a new primary school is needed to accommodate the already burgeoning population in the area; however, with the additional housing proposed at this site, the current overcrowding in classrooms will continue to be an issue, so much so that the net result would be negative and thus the claimed public benefit is illusory.

### Task 2: Land Use, Zoning, and Public Policy

As noted above, the study area should be expanded to a radius of 1 square mile. 400 feet is simply myopic for the site and the density proposed. Land use trends must be evaluated in their historical context, including historical buildings on Fulton Street, and the historically and architecturally significant neighborhoods of Boerum Hill and Ft. Green.

The development of Hoyt-Schermerhorn must be included in the assessment of neighborhood and community plans.

We pause to note that while we anticipate that the EIS will assert consistency with current public policies to increase availability of housing stock as justification for the enormity of the project, we are concerned that New York City will not be able to build its way out of a housing crisis with luxury projects that include a small number of subsidized units themselves priced at rents higher than neighborhood median incomes can afford. Our experience in Brooklyn is that such projects only increase pressure on rents, displacing people who can't even qualify to enter lotteries for the new, supposedly "affordable" housing. There is nothing about the proposed project at 80 Flatbush that alters our concerns in this regard.

**Moreover, we are concerned that the proposed FAR of 18 is far too great for the area.** It is, in fact, unprecedented and our many years of experience with development in and around Downtown Brooklyn tell us that our fears regarding an FAR of 18 are not misplaced. Current zoning, as cited in the Draft Scope would permit a building of 330 feet including bulkheads. The proposed development would include two towers, one of which would be 960 feet tall, more than 400 feet taller than the Williamsburg Bank building at One Hanson Place and even dwarfing other new towers in the area. We are extremely concerned that 960 feet will become the new normal, and we do not believe that is in the best interest of the communities we represent. Nor do we see any effort to justify this height as economically sound and request that it be thoroughly analyzed and evidence submitted to support the economics of such height.

Moreover, the proponent seeks exceptions to the current setback requirements. These setbacks exist so as to provide light and a feel of less density and greater community on the ground. We do not see a rationale for this exception in the Draft Scope and request that the EIS thoroughly analyze this and produce evidence to support the request.

### Task 3: Socioeconomic Conditions

There is cause to be concerned that the proposed housing units will attract a new population with a higher income than surrounding neighborhoods, such as Downtown Brooklyn. Phase I includes studio and one-bedroom apartments, in one of the two luxury towers. The affordable housing units will not be

included in this phase. **We are concerned that the proposed building will further displace the African American community in the area, which has already suffered significant displacement. We would like this thoroughly analyzed as well as the effect on the market value of the housing on the 400 and 500 blocks of State Street, whose homes would be directly impacted by the construction of such tall towers.**

#### Task 4: Community Facilities and Services

Conducting construction for a new school directly next to the current Khalil Gibran High School building could be tremendously distracting for the students throughout the school year. While this outdated building should no longer be used for this school, and the construction of a new one is of the utmost importance and needed urgently, significant thought and attention should be given to how and when construction should take place. School holidays and vacation periods should be maximized for construction periods to reduce the disturbance that nearby construction will undoubtedly have on the students at the high school.

**We are extremely concerned about the issue of school overcrowding in this area.** While the Draft Scope cites to statistics for District 15, the site is virtually surrounded by District 13 which has school overcrowding issues as well. The rapid pace of residential development in and around Downtown Brooklyn has only exacerbated this problem with no relief in sight. Each attempt to build school space into a massive residential development furthers the area's shortage of school seats. The instant proposal is no different. It proposes to add 922 new residential units, which will add an estimated 510 new public school students using the Department of Education's own formula. The 370 new school seats that 80 Flatbush is offering leaves a net negative of 140 school seats in an area where residents are facing overcrowding in their public schools already. It appears that at least 140 additional school seats are required to support the students projected from 80 Flatbush alone. This does nothing to address the current shortage, but would leave hundreds more students high and dry.

We request that the EIS analyze the area construction over the next five years (as mentioned in Task 2 of the Draft Scope of Work) in this regard. There are 4,000 new units of housing under or near construction in the area and another 2,000 in the pipeline. A thorough and dispassionate analysis is needed and will help gauge the number of school seats that are actually needed and could potentially modify the plans for the two schools.

We also ask that the effects of the proposed project on the firehouse on State Street, Engine 226, be analyzed as well.

#### Task 5: Open Space

Boerum Hill in particular has no parks and is in desperate need of additional green space. This is according to the City's own metrics. We believe that there will be direct effects on open space as the number of people in need of such space, and in particular, active green space, will increase dramatically and this lack of open space must be analyzed.

#### Task 6: Shadows

It is important that shadow studies be considered for the new towers that are being built. The towers that have been proposed are much taller than any other tower in Downtown Brooklyn and would significantly change the landscape of the area. Moreover, these towers would be next to 4-story residential buildings and entirely shift their surrounding views. The sheer height of the proposed towers separates it from the rest of the Brooklyn skyline. In addition, reflections from the proposed glass

towers must be evaluated. We are also concerned about wind patterns as the area is increasingly windy as a result of the many tall buildings that have been constructed in the area.

#### Task 7: Historic and Cultural Resources

Again, the best way to evaluate how the surrounding area is affected by the new development is to expand the study area. The current study area of 400 feet is far too small. Boerum Hill, a New York City historic district with many buildings on the national and state registries of historic places is the neighborhood within which the proponent seeks to build. It is comprised of many 4-story brownstones that are wildly dissimilar to the 80 Flatbush proposal. In order to truly understand the potential adverse effects of the development, the study area should be expanded as indicated above.

#### Task 8: Urban Design and Visual Resources

We reiterate here our serious concerns regarding the proposal for an 18 FAR, as well as the requests for the elimination of required setbacks to the towers. As is indicated in the current proposal, the residential towers will be the tallest buildings thus far in the Downtown Brooklyn area (the buildings are not in Downtown Brooklyn, but in Boerum Hill), and would obliterate the views of some of the already existing icons of the Brooklyn skyline. The Williamsburg Savings Bank Tower, or 1 Hanson Place, is a focal point of Downtown Brooklyn. It is a beautiful and historic piece of architecture that has become personally significant not only with its inhabitants, but with many visitors to Brooklyn. Current residents at 1 Hanson Place are concerned that their beautiful tower that they fastidiously maintain will be blocked completely from sight. The view of this building should be considered when finalizing the height and design of the new towers so as not to detract from the Brooklyn skyline as it exists now, but rather enhance it and create a sense of cohesion within the context of the area.

#### Task 9: Environmental Materials

The students at Khalil Gibran High School will remain in their current building as construction on the two new schools takes place. The noise level is already a concern, but the use of hazardous materials can also negatively affect the students. We believe that the proponent understands and will be exceedingly careful in the analysis of hazardous materials at the site.

#### Task 10: Water and Infrastructure

Water and infrastructure must be considered in the context of an additional 4,000 to 6,000 new residential units. The area is uphill from the infamous Gowanus Canal superfund site. Water run-off and storm water retention issues must be thoroughly analyzed.

#### Task 11: Transportation

Scoping should also include subway and car traffic trends, not solely at peak periods but at all times of day and night, to understand congestion impacts. Traffic at the crossroads of Brooklyn is such that the traditional peak/off-peak analysis fails. Traffic is congested throughout the day. Additionally, an analysis of each intersection near the development site should be conducted to understand possible safety issues. The proposed schools will require students to cross Flatbush Avenue at particularly dangerous intersections. The advent of new housing and thousands of people commuting to school and work will generate a significant increase in transit and crowding.

The Draft Scope mentions 18 intersections to be analyzed without identifying them. To the extent those 18 intersections will be an outgrowth of the TDF, the public must be noticed of those intersections before the EIS is conducted and have opportunity to comment on the intersections' dynamics and the proposed analysis.

Moreover, the EIS does not address transit issues because the study area is drawn to exclude them—there is no subway stop within the proposed study area.

The area is also prone to major traffic congestion. Flatbush Avenue is not a safe place to make deliveries, nor is it a good place for school buses to pull up, but neither is State Street for a host of reasons. The issues of loading docks and school drop-off and pick-ups must be carefully and thoroughly analyzed.

Task 12: Air Quality

The EIS must identify with precision the steps to be taken to mitigate construction dust and debris.

Task 14: Noise

We reiterate the need for construction noise to be at a minimum during school hours and for construction to be limited to weekdays.

Task 16: Neighborhood Character

It should be clarified at the outset that the neighborhood character to be assessed and conformed to must be historic Boerum Hill. The Draft Scope indicates that neighborhood character is made up of factors including land use, urban design, visual resources, historic resources, socioeconomic conditions, traffic, and noise. However, we submit that neighborhood character is also a factor of the people who live in the area and the area's small business community serving them. What makes New York City's neighborhood worth investing in and fighting for are the people. Please do not dismiss this important factor in the analysis.

From an urban design point of view the current proposal seems far too reminiscent of "tower in the park" design, an outdated and unsuccessful approach which altered life in the streets and detracted from what Jane Jacobs described as the need for, "eyes upon the street, eyes belonging to those we might call the natural proprietors of the street." Boerum Hill has eyes on the street and community dynamics worthy of respect and consideration in any development.

Task 17: Construction

See above.

Very truly yours,



Senator Velmanette Montgomery



Assemblymember Jo Anne Simon

cc: Brooklyn Borough President Eric L. Adams  
Councilman Stephen Levin



CITY OF NEW YORK  
**Community Board No. 2**

350 JAY STREET - 8TH FL.

BROOKLYN, N.Y. 11201

(718) 596-5410 FAX (718) 852-1461  
cb2k@nyc.rr.com

ERIC ADAMS  
*Borough President*

SHIRLEY A. M<sup>c</sup>RAE  
*Chairperson*

ROBERT PERRIS  
*District Manager*

July 28, 2017

Jennifer Maldonado, Executive Director  
New York City Educational Construction Fund  
30-30 Thomson Avenue, Fourth Floor  
Long Island City, New York 11201

*via email: KhalilGibran80Flatbush@schools.nyc.gov*

Dear Ms. Maldonado:

I am writing to comment on the draft scope of work for the draft environmental impact statement (DEIS) for "80 Flatbush," a proposed five-building, mixed-use development project consisting of up to 922 residential units, approximately 245,000 gross square feet (gsf) of office space, a 350-seat high school to replace the existing Khalil Gibran International Academy, a new 350-seat primary school, approximately 50,000 gsf of retail, an approximately 15,000 gsf community facility and approximately 150 below-grade accessory parking spaces, to be located on the trapezoidal block bounded by Schermerhorn Street, Flatbush Avenue, State Street and 3rd Avenue in Brooklyn. My comments follow the format of the proposed scope of work.

**Task 1: Project Description**

I note that Figure 1 in the draft scope of work does not include 333 Schermerhorn Street, 300 Ashland Place and 15 Lafayette Avenue, which together contain over 1,200 apartments, nor does it map 590 Fulton Street, just beyond the 400-foot radius around the project. Brooklyn Community District 2 is a highly dynamic area and I encourage the Educational Construction Fund (ECF) and its consultants to take care in obtaining the most current data available.

**Task 2: Land Use, Zoning, and Public Policy**

The study area for the development history and analyses of land use patterns and trends, existing zoning and recent zoning actions, public policies and plans, other projects anticipated to be constructed, and pending zoning or public policy actions should be for a 1,000-foot radius around the project site.

A study area expanded to this distance, still less than a quarter-mile, will ensure that the DEIS takes into consideration Site 5 of the Atlantic Terminal Urban Renewal Area, the existing

Jennifer Maldonado, Executive Director  
New York City Educational Construction Fund  
July 28, 2017  
Page 2

Boerum Hill Historic District, the boundaries for an expanded historic district submitted to the Landmarks Preservation Commission (LPC) and the Downtown Brooklyn Cultural District. An expanded study area will also include analysis of the underdeveloped sites at 24-30 4th Avenue and 570 and 625 Fulton Street, perhaps among others that would be otherwise omitted.

### **Task 3: Socioeconomic Conditions**

I reiterate Borough President Eric L. Adams' request for documentation of rent-stabilized buildings where the zoning floor area utilization is less than half of the permitted floor area. As the borough president notes, the Rent Stabilization Code allows a building owner to not renew the lease of a rent-stabilized tenant if the owner intends to demolish the building and has approved plans and financing for new development.

I also restate the borough president's request for documentation of rent-controlled units where the rent being charged per the lease is less than the legally permitted rent registered with New York State Homes and Community Renewal. At lease renewal, owners of such units are free to increase the rent to the legally permitted amount, potentially resulting in a tenant vacating the unit.

Both scenarios demonstrate how rent-stabilization status does not necessarily protect against indirect residential displacement and why the requested documentation should be included in the DEIS.

### **Task 4: Community Facilities and Services**

#### Public Schools

The DEIS should provide capacity, enrollment and utilization data for all elementary schools in Community School District 15; a map of the zones for all primary schools in the vicinity of the proposed project; and a list of all other residential development projects that may create demand for the schools in the vicinity of the project.

#### Libraries

I note that most books and other material now "float" within the Brooklyn library system and no longer have a 'home branch' to which they are returned. Therefore, holdings per resident may not be the best measurement of existing conditions or the impact of the proposed project. Total number of seats, current seated occupancy rate at peak periods and projected change in demand may better express the impact of the project on the local libraries.

I also note that the Brooklyn Public Library (BPL) plans to open a facility within the so-called "cultural condominium" at 300 Ashland Place. The new space may not appear on some inventories of BPL branches.

Jennifer Maldonado, Executive Director  
New York City Educational Construction Fund  
July 28, 2017  
Page 3

Health Care Facilities

No Comment.

Publicly Funded Child Care Facilities

In addition to location, capacity (number of "slots") and existing enrollment, please note whether or not each facility is city-owned or -leased and in the latter case, provide the date when the lease will expire.

Fire Protection

The response time of Engine 226, 409 State Street, is sometimes increased due to traffic congestion on 3rd Avenue. The proposed project may directly affect access from the firehouse and accordingly, the DEIS should examine and disclose potential impacts on response time both during construction and following completion.

Police Protection

No Comment.

**Task 5: Open Space**

Boerum Hill is the neighborhood in Community District 2 (CD2) that is most underserved by public open space so I was surprised to read, "... the project site is located in an area that is considered to be neither underserved nor well served by open space." Further, the open space in CD2 is overwhelmingly programmed for passive recreation, many of the parks and playgrounds are small in size, and some open space is publicly-accessible but privately-owned. The inventory should therefore indicate whether each space is for active or passive recreation, provide the size in acres, and state whether it is publicly- or privately-owned.

Please note that some inventories of open space may not list the so-called "BAM Park," bounded by Fulton Street, Lafayette Avenue and St. Felix Street. This city-owned property is currently under the jurisdiction of the Department of Housing Preservation and Development but following the imminent reconstruction of the open space, it will be transferred to the parks department's portfolio.

**Task 6: Shadows**

I am pleased to read reference to the Rockwell Place Garden in this section of the draft scope of work. Community gardeners have expressed great concern to Community Board 2 about the impact of the proposed project on the garden, established almost 40 years ago.

**Task 7: Historic and Cultural Resources**

Without limitation by the proposed 400-foot study area boundary, please include the Boerum Hill Historic District as currently mapped and as submitted to LPC for expansion in the inventory of historic resources to be evaluated.

Jennifer Maldonado, Executive Director  
New York City Educational Construction Fund  
July 28, 2017  
Page 4

**Task 8: Urban Design and Visual Resources**

I urge ECF and its consultants to pay particular attention to the pedestrian experience on State Street, between 3rd and Flatbush avenues. The three- and four-story rowhouses and four- to eight-story apartment buildings on the south side of the street currently face buildings of similar heights. Further, there are no principal entrances to any of the buildings on the north side of State Street.

The proposed project includes one building that is 481 feet tall, with an additional 50-foot bulkhead, and a second residential structure that is 926 feet in height, not including its 60-foot high bulkhead. There are entrances to the proposed 350-seat primary school and one of the two residential buildings, as well as vehicular entrances to a loading dock and a parking garage. This is a dramatic change from the current conditions.

**Task 9: Hazardous Materials**

No comment.

**Task 10: Water and Sewer Infrastructure**

No comment.

**Task 11: Transportation**

Traffic

In addition to urban design considerations (see above at Task 8), significant concern has been expressed about State Street traffic associated with the primary school, the parking garage and loading dock. Please provide a robust traffic analysis of State Street, including a citation of all rules and regulations for the location of garage and loading dock entrances.

Numerous modifications were made to the road network as mitigations for the Pacific Park *née* Atlantic Yards mixed-use development, including in the vicinity of the proposed project. Please evaluate whether or not any of these previous changes need to be modified further as a result of the subject project.

There was considerable public and elected official opposition to a temporary closure of Schmerhorn Street, between 3rd and Flatbush avenues, by the project developer, the New York City Department of Transportation (NYCDOT) and other partners. The proposed site plan shows the permanent closure of the slip lane. Please provide traffic counts and other data by which the impact of the closure may be evaluated.

Transit

No comment.

Jennifer Maldonado, Executive Director  
New York City Educational Construction Fund  
July 28, 2017  
Page 5

Pedestrians

NYCDOT has presented proposed pedestrian safety improvements for the area from Temple Square, adjacent to the proposed project, to Times Plaza. The DEIS should include these improvements in its analysis and report.

Vehicular and Pedestrian Safety

See the immediately previous comment.

Parking

No comment.

**Task 12: Air Quality**

No comment.

**Task 13: Greenhouse Gas Emissions and Climate Change**

No comment.

**Task 14: Noise**

No comment.

**Task 15: Public Health**

No comment.

**Task 16: Neighborhood Character**

Although it is a mixed-use community with development from different periods, Boerum Hill is predominantly a 19th-century rowhouse neighborhood. The character of the built form is maintained by the historic district established in 1973, currently under consideration by LPC for expansion, and a 2009 contextual rezoning of the neighborhood from R6 to R6B.

The project being evaluated proposes to construct a mixed-use development at a density that is, with the exception of Atlantic Yards, a state project, unprecedented in Brooklyn, including in the central business district (CBD). The 2004 Downtown Brooklyn Development Plan, which granted development rights only two-thirds as great as the proposed project, included density and height restrictions in a buffer zone between the CBD and Boerum Hill. Little in the proposed plan mediates between the height and density of the proposed project and rowhouse Boerum Hill. The project will certainly impact neighborhood character.

**Task 17: Construction**

No comment.

Jennifer Maldonado, Executive Director  
New York City Educational Construction Fund  
July 28, 2017  
Page 6

**Task 18: Mitigation Measures**

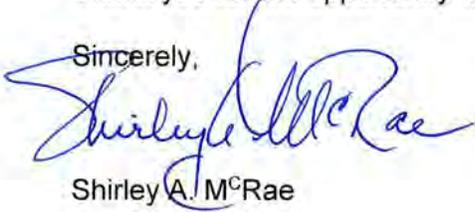
No comment.

**Task 19: Alternatives**

During preliminary presentations of "80 Flatbush," several people have asked to see what could be developed on the block bounded by Schermerhorn Street, Flatbush Avenue, State Street and 3rd Avenue without a zoning change. I encourage ECF and its consultants to include that scenario as one of the alternatives examined in the DEIS.

Thank you for the opportunity to comment.

Sincerely,



Shirley A. McRae

cc: Hon. Eric L. Adams  
Brooklyn Borough President  
Hon. Stephen T. Levin  
New York City Council  
Winston Von Engel, Brooklyn Director  
Department of City Planning  
Regina Myer, President  
Downtown Brooklyn Partnership  
Howard Kolins, President  
Boerum Hill Association

SAM<sup>c</sup>:RP

**THE NEW YORK  
LANDMARKS  
CONSERVANCY**

July 6, 2017

Jennifer Maldonado  
NYC Educational Construction Fund

Re: Alloy development/80 Flatbush

Dear Ms. Maldonado:

The New York Landmarks Conservancy has met with the architects at Alloy and has been shown preliminary design for the proposed mixed-use project on Flatbush Avenue in Downtown Brooklyn. The Conservancy supports the reuse of the historic school buildings on the site and commends Alloy for incorporating these two historic buildings in their development proposal. Neither building is officially designated a landmark and yet they are historically significant. Their retention will preserve a meaningful part of the neighborhoods's history and development. We believe that incorporating the historic buildings in the overall ensemble results in a better project.

The Conservancy also urges the developers to take into account the Community's concerns about excessive height and density. We appreciate that Alloy took our concerns seriously and hope that they take the community's concerns seriously as well.

Sincerely,



Peg Breen  
President

June 28, 2017

**Remarks by Andrew Hoan, President & CEO, Brooklyn Chamber of Commerce at a public scoping hearing held by NYC Educational Construction Fund in support of the EIS draft scope of work for 80 Flatbush Avenue**

Good Evening Ms. Maldonado:

My name is Lori Raphael and I am the Vice President of Strategic Partnerships at the Brooklyn Chamber of Commerce (BCC) speaking on behalf of Andrew Hoan, President and CEO of the BCC in full support of the development at 80 Flatbush Avenue

The Brooklyn Chamber of Commerce is a membership-based business assistance organization which represents the interests of its member businesses, as well as other businesses across the borough of Brooklyn. The Brooklyn Alliance is the not-for-profit economic development organization of the Chamber, which works to address the needs of businesses through direct business assistance programs.

The project for the development of 80 Flatbush Avenue is a welcome addition to Downtown Brooklyn bringing much needed affordable residential units, office space, as well as additional school seats to the area.

There is a dearth of Class A office space in Downtown Brooklyn. If approved, this project would provide approximately 200,000 SF of such critically needed office space. In addition, inclusion of over 200 units out of the approximately 700 total as affordable will help address a shortage of affordable housing in the downtown community. The project will assuage critical infrastructure needs, such as the addition of 700 new school seats, as well as 15,000 square feet of cultural space in the adjacent historic property and 40,000 sf of neighborhood retail.

Demand for office space in Downtown Brooklyn is at an all-time high, driven by growth in innovation and creative businesses. Commercial office vacancy is at an all-time low (3%). The lack of new office space threatens to slow the Borough's strong recent job growth. The new office space at 80 Flatbush is essential to meet Brooklyn's continued growth. It is well located on Flatbush Avenue and adjacent to Atlantic Terminal, making it accessible to all parts of NYC and Long Island. The floor plates (10,000 SF leasable) are well sized for the small and mid-size tenants we see in the market today.

Downtown Brooklyn is a place people and businesses want to be, and will continue to experience strong growth in the coming years. We need to be smart about how we manage that growth. 80 Flatbush is an example of the kind of growth we need. The project's mixed-use nature will be attractive to businesses and make for a vibrant addition to the Downtown Brooklyn streetscape. With the delivery of significant public benefits, a strong architectural expression, and a unique mix of uses, 80 Flatbush is a home-run project that the Brooklyn Chamber strongly supports.

Thank you.

AH/vs

## EIS SCOPING STATEMENT – BOERUM HILL ASSOCIATION

The Boerum Hill Association has always advocated for intelligent growth.

In the 90's our organization played a critical role in the Hoyt-Schermerhorn redevelopment that resulted in a rational separation of hi-rise construction and low-rise residences. Today 24-story buildings are rising on Livingston Street, 12-story buildings on Schermerhorn Street so the 4-story scale of State Street is neither overpowered nor obscured. This rational and respectful paradigm should be a continuing model for *all* development that touches brownstone Brooklyn.

As for the proposed 80 Flatbush development site, Boerum Hill's boundaries have always included the south side of Schermerhorn Street as our northern edge, therefore we consider this triangle of land, south of Schermerhorn Street, to be part of Boerum Hill NOT part of downtown. The clash of two Brooklyns, old and new, high and low, is brought into sharp focus at this location.

The proposed plan would bring super tall buildings to the same block as our 4-story residential brownstones. An increase of the FAR to 18 is unacceptable and the community should not be unduly burdened in the trade-off for the needed benefits. To allow this would be a violation of the rights of the adjacent homeowners who have invested so much in financial and emotional capital. Please don't mistake my attempt to communicate rationally as a lack of outrage on behalf of my neighbors and my neighborhood. We have worked diligently to preserve and protect Boerum Hill.

We believe the public has the right to know the total cost of construction, expected profits and clear disclosures of State and City support via tax abatements or infrastructure costs as a related to this development.

We recognize the need for elementary school seats. We know that the Kahlil Gibran School is in great need of an overhaul. We see the benefits of repurposed two historical buildings as community space especially if they support the arts.

However, the price is just too dear. Two towers, 74-stories and 38-stories, will simply dwarf the nearby buildings to the south. 4000 units of housing will be opening just to the west of this location with another potential 2000 units in the pipeline before Phase II is constructed.

Ironically, the proposed new 350 elementary school seats could be filled before the first tower is completed. Where is the second elementary school and the middle schools? Where is the green space? Yes, we need a lot of things – towers are NOT what we need.

Sincerely,  
Howard Kolins  
President  
Boerum Hill Association

**80 Flatbush Scoping issues:**

Larger scoping area of 2640 feet or at least 1320 feet to encompass new housing, traffic and subway congestion in the area.

Indirect residential displacement – effect on market value of homes on 400 & 500 blocks of State Street.

Fire protection – access for Engine 226 down State Street and/or Third Avenue to Flatbush during construction and post construction in anticipation of construction lane closures and school buses on these streets in addition to current traffic load.

Public schools – enrollment and capacity issues should include the 4000 to 6000 units of housing coming on line or to be constructed in the next 3 to 5 years.

Open space – can this be broken down to separate plazas from green space? While Fort Greene park is to the northeast, Boerum Hill is lacking green space and greatly needs its own park.

Shadows and Reflections– this analysis should also look at any reflections from the glass towers.

Wind patterns – analysis of an already windy area and potential whistling from tall buildings.

Urban design should look at the obstructed view corridor of the iconic Williamsburg Savings Bank building from the west and the south. The proposed designs clash with the local urban design.

Water and sewer infrastructure needs to be considered in context of the 4000 to 6000 housing units coming to the study area.

Transportation issues: traffic, transit (surface and subway), pedestrians, vehicular and pedestrian safety, and parking should be considered over a study area of no less than a quarter mile due to the current load on all these areas. Currently the EIS mentions 18 intersections which are not identified and they should be spelled out. Again, the study area should be larger and look at more intersections and including the construction phases. (Where will the cranes be placed? Where will deliveries and supplies be staged? Which lanes will be closed and on what timetable?)

Pedestrian safety – any 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.

Air quality – what steps will be undertaken to reduce dust during construction?

Noise – how will construction proceed on the new high school with the existing high school still in operation? We oppose any overnight and weekend construction.

Neighborhood character – “contribution to the neighborhood character” depends on which neighborhood is referenced, Flatbush towers or State Street brownstones. The brownstone character should be full weight in any review and not sacrificed to the downtown plan.

Affordable housing – With a potential oversupply of rental units in the area, some of the Phase I tower should include affordable housing.

Loading dock – any loading dock on State Street should not be allowed on that residential street.

From: Howard Kolins [mailto:[hkolins@aol.com](mailto:hkolins@aol.com)]  
Sent: Thursday, June 29, 2017 2:33 PM  
To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>  
Subject: Boerum Hill Associa on Scoping Comments

Dear Jennifer:

Although I submitted them last night, here is an electronic copy.

Thank you,  
Howard Kolins  
[917-833-6960](tel:917-833-6960)

## EIS SCOPING STATEMENT – BOERUM HILL ASSOCIATION

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Sincerely,  
Howard Kolins  
President  
Boerum Hill Association

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From: Howard Kolins <hkolins@aol.com>  
To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>  
Cc:  
Bcc:  
Date: Tue, 25 Jul 2017 17:38:28 +0000  
Subject: EIS Scoping  
Dear Ms. Maldonado:

I would like to make one more request to my previous submission:

For a more accurate and informed study, the EIS should include drawings and elevations of the No Action plan as well as a comparison elevation of heights of all buildings over 12-stories in the study area. We need a better understanding of our options and also more context regarding scale and bulk.

Thank you,  
Howard Kolins  
917-833-6960

---

**From:** Howard Kolins <hkolins@aol.com>  
**Sent:** Friday, July 28, 2017 1:38 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** Additional comments on the EIS Scoping for 80 Flatbush

Analysis of local density, traffic, school seats should include the effects of the following buildings that have recently opened or are under construction and will open in the next few years. All environmental effects should include these new residents with in a larger study area. These total over 7000 units.

New buildings:

250 Ashland	51-stories, 585 units
280 Ashland	12-stories, 123 units
300 Ashland	32-stories, 379 units
300 Livingston	25-stories, 714 units
299 Livingston	17-stories, 37 units
210 Livingston	26-stories, 280 feet
117 Livingston	21-stories, 110 units
415 Red Hook Ln	21-stories, 108 units
333 Schermerhorn	44-stories, 581 units
319 Schermerhorn	21-stories, 74 units
10-16 Nevins	33-stories, 150 units
237 Duffield	21-stories, 105 units
138 Willoughby	59-stories, 450 condos (City Pt Phase III, Extell project)
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 (100 Willoughby)
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
1 Dekalb	tbd
Pacific Park	buildings to come with another 4000 units

Others to consider:

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	

Howard Kolins

917-833-6960

# COMMUNITY EDUCATION COUNCIL DISTRICT 15

Department of Education of the City of New York



July 28, 2017

## **RESOLUTION TO COMMENT ON** **80 FLATBUSH**

The District 15 Community Education Council “CEC 15” held a meeting on Tuesday July 25, 2017. After reviewing all the evidence and facts, CEC 15 passed the following resolution:

**WHEREAS**, CEC 15 hereby resolves to comment on the Education Construction Fund (ECF) project at 80 Flatbush;

**WHEREAS**, the members of CEC 15 present at this meeting consisted of Camille Casaretti, Scott Powell, Neal Zephyrin, Charles Star, Mark Bisard, Nicole Brier, Antonia Ferraro Martinelli, Kathy Park Price, and Elizabeth Velez;

**WHEREAS**, on June 28, 2017 former CEC 15 members Henry Carrier and Jiin Wen, and current CEC 15 member Nicole Brier attended a Draft Environmental Impact Statement (DEIS) Scoping meeting on the proposed development at 80 Flatbush Avenue;

**WHEREAS**, the Education Construction Fund (ECF) selected Alloy to redevelop the 350 seat Khalil Gibran International Academy, and to create a 350 seat elementary school, two large buildings offering 800 to 950 residential units combined, as well as retail and office space;

**WHEREAS**, Alloy requested variances including zoning changes to allow for an increased FAR of 18, almost three times the current allowance of 6.5;

**WHEREAS**, Alloy requested a transfer and lease of city and state property;

**WHEREAS**, Alloy requested state funding in the form of tax-exempt bond financing from the Education Construction Fund (ECF);

**WHEREAS**, 90% of public comments at the well-attended scoping meeting were opposed;

# COMMUNITY EDUCATION COUNCIL DISTRICT 15

Department of Education of the City of New York



**WHEREAS**, at the scoping meeting, the local fire chief and The Boerum Hill Association voiced concerns about traffic and congestion based on the location abutting 3rd Avenue and State Streets, in the vicinity of the Atlantic Center Terminal and Barclays Center;

**WHEREAS**, at the scoping meeting, several local Parent Teacher Associations were present and opposed to the project at 80 Flatbush;

**WHEREAS**, Khalil Gibran International Academy and the business community are in favor;

**WHEREAS**, in accordance with The City Environmental Quality Review (CEQR) Technical Manual under Chapter Six, ECF show a net increase in primary school seats to District 15 using the multiplier for estimating elementary school students generated by new residential units for Brooklyn;

**WHEREAS**, the formula likely underestimates the number of added students, as it is widely seen as outdated;

**WHEREAS**, we ask the Environmental Impact Statement scope to re-examine if this multiplier is adequate for the current growth rate for the borough of Brooklyn;

**WHEREAS**, this multiplier does not account for middle school seats. This project will likely generate more total students than the number of additional seats provided in all scenarios proposed by ECF/Alloy and contribute further to District 15's serious school overcrowding situation;

**WHEREAS**, the NYC School Construction Authority (SCA), currently has a budget of \$5.9 billion to build new school capacity in the city;

**WHEREAS**, if the SCA used its own funds to build a school on the proposed site, without granting zoning variances, the added seats would improve district-wide overcrowding;

**WHEREAS**, several community members voiced additional concerns and opposition to the 80 Flatbush project at the July 25<sup>th</sup> CEC 15 Business Meeting.

# COMMUNITY EDUCATION COUNCIL DISTRICT 15

Department of Education of the City of New York



The District 15 Community Education Council therefore,

**RESOLVES TO COMMENT**, as an opportunity to refine ECF's proposed Alloy development at 80 Flatbush Avenue. The current proposal will not alleviate, but likely exacerbate, both the current student overcrowding issue and the school equity issue in District 15. ECF's project utilizes an outdated formula to determine primary school seats and doesn't weigh middle school impact. The project's completion date of 2021 increases the likelihood that this multiplier will be more inadequate and the likelihood that all the new primary school seats at 80 Flatbush will be used by the residents of the development. Though the project designates some affordable units, given current zoning tendencies, creating a school utilized primarily by one block of residents exacerbates the equity issue CEC 15 is committed to solve. CEC 15 proposes ECF and Alloy provide 750 to 1,000 primary school seats to truly address district overcrowding and integration. CEC 15 encourages ECF and NYC School Construction Authority to renovate Khalil Gibran International Academy and utilize the remaining property at the site to materially increase the number of seats available to all children in District 15, fully accounting for the increased demand anticipated from all area residential development. The current proposal fails to do that. However, we support ECF in its mission to provide more schools. CEC 15 looks forward to working with ECF to make 80 Flatbush better meet the needs of District 15.

**RESOLUTION PASSED UNANIMOUSLY.**

**CC:**

**Jennifer Maldonado, Exec. Director, NYC Educational Construction Fund**

**[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)**

**Anita Skop, Superintendent District 15**

**Council Member Stephen Levin**



# ATLANTIC AVENUE LOCAL DEVELOPMENT CORPORATION

494 Atlantic Avenue

Brooklyn, New York 11217

Tel: 718-875-8993 Fax: 718-935-0832

Email: AtlanticAve@AtlanticAve.org

July 10, 2017

**CHRISTIAN HAAG**  
*Co-President*

Jennifer Maldonado,  
Executive Director  
New York City Educational Construction Fund

**NAT RUBIN**  
*Co-President*

Email: KhalilGibran80Flatbush@schools.nyc.gov

**SUE WOLFE**  
*Co-Vice President*

Dear Ms. Maldonado:

**DARLENE C. SAMUELS**  
*Co-Vice President*

As the mission of the Atlantic Avenue Local Development Corporation (AALDC) is to further economic development, historic preservation, and cultural enrichment, we have historically supported responsible real estate development in our neighborhood. Unlike many of the recent developments in downtown Brooklyn, 80 Flatbush does actually address some specific cultural and historical (and educational) components. Like many developments, we have concerns about the impact of construction, and overloading the neighborhoods infrastructure. However, we are particularly concerned about the impact of this massive project on the overall fabric and character of the neighborhood. We feel this needs to be better addressed in the Scope of Work for the EIS.

**ENZA FERRANTE**  
*Treasurer*

**SHARON TAYLOR**  
*Co-Secretary*

First of all, we feel that a 400 foot study area does not adequately reflect the impact of all the new developments in Downtown Brooklyn on local resources and character. Wouldn't it make sense to increase the scoping area to a half-mile?

**JAMIE FEDERICO**  
*Co-Secretary*

## DIRECTORS

Debra Hare-Bey  
Katya Issaeva  
Jonathan Jeanty  
Tori Lawrence  
Terry McMahan  
Rob Norman  
Ayodele Oliver-Carnegie  
Eileen Trilli

In regard to schools, a new elementary school and the renovation of Khalil Gibran high school are, of course, welcome. However, with addition of the Hub, The Ashland, and Caesura, there are 1,800+ new apartments just within the 400 foot scoping area! What about all the other additional new development within the district? What is the realistic outlook for elementary and middle school resources? How will it effect current residents, and the success of the new developments. What is the city's plan without 80 Flatbush? Should we expect a 75-story tower for each new elementary school in Brooklyn?

## EXECUTIVE DIRECTOR

Tammy Ben-Eliezer-Baxter

There is very little public green space in the Boerum Hill area. Opportunities need to be considered to support the increase in population with appropriate outdoor, public gathering spaces. Not just concrete pedestrian plazas, but actual areas of respite and relaxation, critical to maintaining and building a Brooklyn community. What are the quantitative and qualitative measurements to be used for Open Space? And is just maintaining the status quo even adequate?

## ADVISERS

Wids DeLaCour  
Angela Ferrante  
Abby Grodin  
Catherine Springer

Additionally, the status quo should not be measurement for pedestrian and bicycle safety. This area is already been targeted by the DOT as particularly dangerous. Why is the EIS only looking at high-crash locations? The study should take into account all the future changes in pedestrian, bicycle and motor vehicle traffic and infrastructure. Future problem areas can then be anticipated and mitigated with innovation and collaborative measures.

Forward thinking is also needed in regard to Urban Design and Visual Resources. As stated by BHA, the scale of Downtown Brooklyn development needs to blend with Boerum Hill. Allowing a 74 story tower directly adjacent to State Street (and looming over Atlantic Avenue) will damage the fabric of the neighborhood, and will be looked at now, and in the future, with bewilderment. Blocks of Brownstones are iconic and historical, and are what help make Brooklyn unique, marketable, and economically sustainable. It's the new white picket fence. Brooklyn is not just the Williamsburg Savings Bank. What are the specific criteria for scale of the buildings, view corridors and competition with icons in the skyline?

In regard to the fabric of the neighborhood it is important to look at how the Socioeconomic Conditions work together. How do rising rents across a half-mile scoping area cause indirect residential displacement not only based on income brackets. Does the scoping study also look at the effect on racial and ethnic groups? And in turn, does that indirect residential displacement cause indirect business displacement of business who support those displaced groups? Furthermore, shouldn't there be affordable housing in Phase 1 of the project to more quickly address displacement?

What are the "predominant factors" in our "neighborhood character" that are going to be measured in the EIS. From our point of view, the successful economic development of Brooklyn has been mainly built on the comforting scale, natural surroundings, combined with Brooklyn's culturally and economically diverse communities. That is the neighborhood character that needs to be preserved. Not just for the benefit of those who have been here, but those moving here, and the developers who better be staying here.

A tree grows in Brooklyn, not just a slick high rise, supplied with the latest kitchen amenities and the retail-of-the-moment in the ground floor. That can be built anywhere. But admittedly, people need places to live in this burgeoning city. We just want to help do it right, integrating the old and new, the high and low, and the rich and the poor.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Nat Rubin', written in a cursive style.

Nat Rubin  
Co-President  
AALDC

July 28, 2017

Molly Skardon  
Co-President  
YWCA of Brooklyn Tenants Association  
30 Third Avenue, #907  
Brooklyn, NY 11217  
(718) 852-2224  
[ywcabklynta@gmail.com](mailto:ywcabklynta@gmail.com)

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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**From:** Anita Inz <anita.inz@gmail.com>  
**Sent:** Saturday, July 08, 2017 11:27 AM  
**To:** Khalil Gibran 80 Flatbush  
**Cc:** Community board 2 Rob Perris  
**Subject:** 80 Flatbush Environmental Impact Scoping

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](mailto:KhalilGibran80Flatbush@schools.nyc.gov)

Re: 80 Flatbush Environmental Impact Scoping

Dear Ms. Maldonado

I am writing with comments and questions for the environmental impact scoping for 80 Flatbush.

I request that the study be done on an area of 1/2 mile, not 400 feet. Also, the study needs to include the projected population increase from all the new construction in the area.

What will be the effect of this proposal on the required seats in schools at each level, for both publicly and privately funded schools?

Will it be a net increase or decrease in required seats? How and on what timetable will the DOE address a seating deficit?

What will be the demand of this proposal on the existing sewer system? How will the existing system accommodate the new demand?

What will be the effect on the local subway platforms, subway cars, bus stops and buses during rush hours?

What will be the effect on traffic and on air quality?

What will be the effect on pedestrian and cyclist traffic and safety?

What will be the wind noise and reflections? And effects thereof?

What will be the effects of the new shadow?

Is there any 50+ tower within 60 feet of a 4-story brownstone elsewhere in Brooklyn or would this be the first?

How does this construction respect transitional zoning? The context criteria for design should have a reference to brownstone Brooklyn. Does it?

Thank you very much and I look forward to your response.

Sincerely yours,

Anita Abraham-Inz

Dear Ms Maldonado,

I have a series of comments and questions regarding 80 Flatbush and its EIA. Kindly see below.

Thank you,

Spencer Adler

### **ECF (Education Construction Fund) RFEI public process transparency:**

- The ECF uses tax payer funds to build schools by issuing tax-free bonds backed by the credit of the City of NY.
- The ECF put out a bid for developers to partner with on the project of rebuilding the Khalil Gibran High School.
- What transparency was provided on this public RFEI process?:
  - What was the public RFEI process?
  - Where is the original RFEI document?
  - When did the process occur?
  - How were competitive bids sourced?
  - Who were the other bidders?
  - Who was on the review committee?
  - What were the criteria for selecting the most qualified developer among all bidders?
  - Who were the finalists considered?
  - None of this appears to be outlined on the ECFs website about the project: <http://schools.nyc.gov/community/facilities/ecf>
- Request for transparency about the use of public funds via ECF:
  - How much taxpayer dollars will go to fund the school portion of the 80 Flatbush Project?
  - What will the term of the tax-free bonds be?
  - If the project goes bankrupt after issuing the bonds, who will be responsible for paying the bond-holders?
  - In addition to paying for the school, what form of tax abatement or other benefit will be issued for the building?

### **Comments / Concerns about Alloy, LLC:**

- What are Alloy LLC's qualifications to build a project of this scale?
- Their largest project to-date was 1 John Street, a 42-unit boutique condo project in DUMBO: <http://www.alloyllc.com/work/one-john-street>
- How will a 14-person firm complete a project with as many floors as the 1 World Trade Tower? (80 Flatbush proposed 112 total stories + two schools and other surrounding buildings).
- What happens if the project fails or goes bankrupt mid-stream? What is the contingency plan to ensure it won't be left as an incomplete construction site with no new schools as promised?

### **Expand Area of Environmental Impact Assessment:**

- The scoping document proposes an environmental impact assessment area of a 400-foot radius around the site.
- That covers an area bordered by:
  - North: Livingston & Flatbush
  - South: Atlantic & 4<sup>th</sup> Ave.
  - East: One Hanson Place (Just short of St. Felix St.)
  - West: State (bet. 3<sup>rd</sup> – Nevins)
- Request: extend impact area to 1-mile radius (5,280 ft.)

### **80 Flatbush school concerns:**

- Negative impact on school overcrowding
  - DOE / SCA formula for projecting public school students:
  - <http://www.nycsca.org/Community/Capital-Plan-Reports-Data#Housing-Projections-70>
  - Every 100 units of residential housing will yield 55 public school students:
  - The 922 proposed residential units of 80 Flatbush will bring 507 new students.
  - The new 350-seat elementary school will be a net negative of 157 seats (the new Khalil Gibran H.S. is just a replacement for existing seats)

- By NYC DOE math, the school aspect of the project will contribute to local overcrowding, **not alleviate it**.
- Local zoned public schools including P.S. 38, P.S. 261, P.S. 133 are already at or well over 100% capacity.
- Noise impact on learning:
  - Research shows noise (such as construction noise) can have a severe adverse impact on students' ability to learn.
  - The plan calls for keeping the KG H.S. open for the entire project and keeping the new elementary school open during construction of phase 2.
  - <http://www.thirteen.org/metrofocus/2012/08/gauging-the-impact-of-noise-on-childrens-learning/>
- Traffic danger for students:
  - Having 350 students enter / leave a high school on Flatbush Avenue daily is dangerous to the students.

### **Zoning exceptions requests:**

- FAR increase
  - FAR increase request from 6 to 18 is 3x what it is zoned for.
  - This will allow 112 stories to be build on the site vs. approx. 34
  - If Alloy does not receive the FAR exception, they have said they will not build the school.
  - Changing site zoning from C6-2 to C6-6 is unprecedented and unjustified. As noted above, this site is not in Downtown Brooklyn and no area of Downtown Brooklyn is zoned above C6-4.
- Setback requirement removal
  - Project is requesting an exception ignore any setback zoning requirements.
  - This would allow the 38-story phase-1 tower to build straight up from the street with no setback.
  - This will block light from all surrounding areas in all directions.

### **Project Size / density concerns:**

- Requested FAR increase from 6 to 18 is 3x what is zoned for this residential neighborhood.

- A glass skyscraper **the size of the Chrysler building** will dramatically change the fabric of the residential neighborhood and surrounding area of Brownstone Brooklyn.
- This project does not respect the surrounding neighborhood.
- The two towers will block the site lines of the Landmarked Williamsburgh Savings Bank Tower from most western neighborhoods, including Manhattan and the Harbor.

### **Safety / Traffic congestion / public transportation / pedestrian safety**

- The 80 Flatbush Ave development site is located at one of the busiest crossroads in New York City. 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
- The addition of a loading dock on State Street near a public school entrance and the tower's residential entrance will compromise pedestrian safety.
- 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?
- Area traffic and public transportation are already congested, especially during events at the Barclay's Center. How will this project avoid making these issues untenable?
- Concerns about a large glass skyscraper that blocks both the low rise brownstone area and the views of OHP from the surrounding neighborhood.
  - Concerns about construction dust and soil contaminants that can be disrupted over an 8-year construction project.
  - Such massive structures change the complexion of the neighborhood with no real coordinated approach at neighborhood and city planning.

### **Glare / Wind / Shadow impacts**

- Structures of this size can have a substantial impact on the aerodynamics of an area. The corner of Flatbush and Hanson Place is already one of the windiest corners in Brooklyn and has been made more so with the addition of 300 Ashland and The Hub.

- The impact study needs to include an assessment of the potential impact of the change in wind patterns and potential impact on the surrounding neighborhood.
- Similarly, glare from glass towers affect light, heating, cooling etc. of nearby residences.
- The need for the expansion of the impact radius is necessary to fully address the potential impact of shadow, wind, and glare from a nearly 1,000 foot structure.

### **Public Green Space**

- The neighborhood's limited green spaces are already congested and overused.
- Why is this project not offering any additional public space or green space like the public plaza recently opened at 300 Ashland?

### **Construction hours / noise / pollution / duration / vibrations / damage impact:**

- During what hours / days of the week will construction take place?
- If the goal is to keep the Khalil Ghibran school open during the entire project, will that push construction hours to nights and weekends, further disrupting the residential neighborhoods?
- What steps is Alloy planning to take to mitigate construction noise, dust and other pollution that may be harmful to students, residents, tourists, etc.
- If the construction unearths lead, asbestos or other toxic substances in the demolition of buildings from the 1860s, what steps will Alloy take to notify the public and remediate?
- What is Alloy going to do to minimize the impact on the community of this project during an 8-year construction timeline? What compensation will be given to the neighborhood if the project goes over the projected timeline or fails in the middle?
- What measures will be taken to ensure the construction of such a large-scale project in a residential neighborhood does not inflict damage on the historic brownstones on State Street as well as the the landmarked Williamsburgh Savings Bank tower across the street? If damage is incurred, what compensation is Alloy prepared to offer area residents?

### **As of Right design:**

- What would an as of right building look like? (i.e. using the zoning the lots have the right to build without the zoning exceptions they are seeking)
- Alloy and the ECF have not provided a design of what they would build with no zoning exceptions.
- Why is Alloy not offering to include schools, the ECF and cultural space in the project if they do not obtain the zoning exceptions they are requesting?

----- Forwarded message -----

From: Eric Albert <[jericalbert@hotmail.com](mailto:jericalbert@hotmail.com)>

To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>

Cc:

Bcc:

Date: Thu, 27 Jul 2017 16:39:23 +0000

Subject: Comments on Proposed 80 Flatbush Project

Jennifer Maldonado, Executive Director  
New York City Educational Construction Fund  
30-30 Thomson Avenue, Fourth Floor  
Long Island City, NY 11101

Dear Ms. Maldonado,

As a long me r resident of Boerum Hill and a next-door neighbor of this proposed sing of tw o towers, I wish to emphasize the nature of my neighborhood and how out of place these structures will be and the harmful condions their placemen t will wreak. Such sing viola tes the integrity of our low-rise residenal buildings

and, I believe, is a violation of transitional zoning and density. Additionally the plan does not properly show the effect of the shadow it will cast on our buildings and back yards, affecting the light and the growth of our yards.

While we at the eastern end of State Street may border on the Downtown district and on the Atlantic Terminal area, this has always been a strictly residential neighborhood of low-rise brownstone and small apartment buildings. These two towers will necessitate the incursion of large trucks into the daily traffic of an already overburdened street-scape of Third Avenue and State Street. The EIS hardly mentions the effects of traffic that will result from these structures.

The EIS's 'study area' of 400' is woefully inadequate as it does not include even the HUB building approximately 500' away, literally around the corner. This 55-story structure is just coming on line with 600 apartments ranging from \$2,500 to \$6,000, but other buildings are also nearby that should be considered within the EIS. At a minimum a half-mile radius needs to be used for evaluation of the effect on the area where over 6,000 units will soon be available.

No provision seems to be made for commercial rents or spaces for the myriad small business that need to offer services required to meet the proposed (and actual) demand the burden these many families will place on the area.

While the area and Boerum Hill in particular needs more (and better) schools, this proposal seems to provide very little for the vast number of residential spaces proposed. To better evaluate the effect it would have on the neighborhood the EIS must include drawings and elevations of "No Action Plan" as well as a comparison of elevation of heights of all buildings over 12 stories in the expanded study area.

There is no open space proposed for the community and while there appears to be some green space within the context of the schools it would not appear to be available to the public.

Furthermore, signing schools, even a high school, puts a large number of young people out on streets with some of the busiest traffic in the nation, let alone the city, on Flatbush Avenue and Schermerhorn. Toddlers and young children would be on State Street but would have to negotiate traffic along Third Avenue or attempt to cross Flatbush Avenue further east. Automobiles picking up children will interfere with traffic on both State and Third during the morning, compounding an already overburdened rush hour, as well as adversely affecting the afternoon traffic rush hour with commercial traffic from South Brooklyn along Third Avenue and the eastern flow of traffic along State Street.

This is an outrageous attack on this community and it doesn't even propose any amenities to mitigate it. These towers overwhelm our area and will do little to improve our neighborhood while making it less attractive.

Sincerely,

Eric Albert

459 State Street

Brooklyn, NY 11217

From: Daryl Alexander <daryl.r.alexander@gmail.com>  
To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>  
Cc: "montgome@nysenate.gov" <montgome@nysenate.gov>, "simonj@nyassembly.gov" <simonj@nyassembly.gov>, "slevin@council.nyc.gov" <slevin@council.nyc.gov>  
Bcc:  
Date: Mon, 10 Jul 2017 22:59:02 +0000  
Subject: 80 Flatbush Project: ISSUES  
Dear Sir/Madam:

Please address increased density in Downtown Brooklyn with the addition of more than 1,400 apartment units in the vicinity of 80 Flatbush.

Area subway trains were already crammed with passengers. Narrow train platforms (Nevins) are crowded at rush hour. Bus service is often sporadic or delayed because of street work.

Density. Density. Density.

It's an overriding issue.

Please take a long view here and really plan the work and work the plan.

Right now another site brings additional problems with now solutions in the immediate future.

Daryl Alexander  
Fort Greene resident  
1 Hanson Place  
Apt. 19G  
Brooklyn, NY 11243

Sent from my iPad

From: Ann Armbruster <ann.armbruster@gmail.com>  
To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>  
Cc:  
Bcc:  
Date: Tue, 11 Jul 2017 02:37:49 +0000  
Subject: Questions in response to the EIS for the 80 Flatbush Development Project

Jennifer Maldonado, Executive Director  
New York City Educational Construction Fund  
30-30 Thomson Avenue, Fourth Floor  
Long Island City, NY 11101

Dear Ms. Maldonado:

Thank you for reviewing questions from concerned long-time community members such as myself.

I would like to ask that the Study Area of the proposed 80 Flatbush Avenue development be changed from 400 feet to one-half mile in all directions from the project site, to give us a truer sense of the impact of this massive project on the surrounding community and its utilities, services and quality of life.

I would ask that this study include a review of the effects of the tower and its surrounding buildings on wind noise and reflections.

What will be the effect on response time of Engine 226 during construction with staging on State Street and Third Avenue? What will be the effect on response time of Engine 226 after completion, considering the additional 900 units in 80 Flatbush, as well as an estimated 6000 new and anticipated units on surrounding blocks?

How will foot traffic safety be ensured for the increased number of pedestrians, especially with school entrances on and around the corner from busy Flatbush Avenue?

Where will school buses load and unload students, especially considering the constricted traffic lanes on Flatbush and the narrow roadway of State Street?

How will garbage from two schools and a 900-unit high rise be removed in a low-rise neighborhood setting, so as to avoid obstructed sidewalks and rat infestations?

How many school age children will result from 900 new units of housing, not just the immediate influx of children but those born to residents within 10 years of the project's completion?

How will the city address the current school seating deficit as well as the greater number of students who will live in units coming on the market?

How will the city ensure that the affordable housing remains affordable? What standards are in place to define affordable? What rules are in place to hold developers to their affordable housing promises even if the rental market goes south?

How will the developers ensure that the extensive retail spaces on the ground floor remain viable for retail in the face of multiple neighborhood retail vacancies?

Thank you for your attention,

Sincerely,

Ann Armbruster  
344 State Street  
Brooklyn, NY 11217

JUNE 28, 2017 PUBLIC SCOPING MEETING  
80 FLATBUSH/ALLOY DEVELOPMENT  
TESTIMONY: SANDY BALBOZA, 321 ATLANTIC AVE.

THE PROSED ACTION TO CHANGE THE SITE, KNOWN AS 80 FLATBUSH, FROM A C6-2 DISTRICT (WITH A 6.5 FAR), TO A C6-6 DISTRICT (WITH A 18 FAR), WOULD ALMOST TRIPPLE THE 330 FOOT HEIGHT RESTRICTION DICTATED BY THE CURRENT AS-OF-RIGHT ZONING REGULATION.

THE REZONING WILL AFFECT THE BOERUM HILL COMMUNITY IN A BAD WAY.

THE SITE, WHICH IS LOCATED IN A RESIDENTIAL NEIGHBORHOOD - AND NOT IN THE DOWNTOWN BUSINESS DISTRICT, IS BOUNDED BY STATE STREET, AND THIRD AVENUE. BOTH ARE NARROW STREETS WITH LOW-LYING 3+4 STORY BUILDINGS.

THE 986 FOOT AND 531 FOOT TALL TOWERS WOULD CREATE A WALL THAT WILL SERIOUSLY CURTAIL, AIR, SKY, AND NATURAL LIGHT FROM ITS NEIGHBORS.

THE ADJACENT BOERUM HILL NEIGHBORHOOD WILL BE DIMMINISHED, AND LOOSE ITS SENSE OF PLACE AND DISTINCTIVE CHARACTER.

THERE ARE ALSO CONCERNS ABOUT BLINDING REFLECTIONS FROM THE GLASS TOWERS - AS WELL AS THE POSSIBILITY OF A WIND-TUNNEL.

THESE IMPACTS MUST BE STUDIED.

THE "NO ACTION" CONDITION WITH ONE EXISTING SCHOOL

WOULD HAVE THE LEAST IMPACT.

THE AS-OF-RIGHT ZONING CARRIES SOME PROTECTION BY REGULATING HEIGHTS AND SETBACKS FOR THIS SITE.

THE 400 FOOT RADIUS STUDY AREA, MUST BE EXTENDED TO A HALF-MILE RADIUS.

THE SCOPE OF WORK DOES NOT STUDY THE CUMULATIVE IMPACTS JUST OUTSIDE OF THE STUDY AREA. ALL NEAR-BY DEVELOPMENT MUST BE INCLUDED,

COMBINED WITH ALL OTHER PAST, PRESENT, AND FUTURE ANTICIPATED ACTIONS, THE INDIRECT AND CUMULATIVE IMPACT MUST BE TAKEN INTO ACCOUNT.

THE TWO SCHOOLS PROPOSED IN THIS PROJECT HAVE BECOME A DISTRACTION, AND ARE DESIGNED TO TAKE THE FOCUS AWAY FROM THE EXTREME HEIGHT, DENSITY, AND IMPACTS OF THIS PROPOSED MEGA DEVELOPMENT.

PRIVATE

LETTING DEVELOPERS DECIDE ON WHERE AND WHEN SCHOOLS ARE BUILT - SHOULD NOT BE THE CITY'S POLICY FOR THIS IMPORTANT PUBLIC INSTITUTION.

NEW DEVELOPMENT SHOULD NOT OUBRWHELM OUR NEIGHBORHOOD GRASSROOTS EFFORTS TO REFORM ZONING REGULATIONS. ALL OVER THE CITY ARE IGNORED.

WE NEED LEADERSHIP FROM OUR MAYOR, THE CITY COUNCIL AND THE DEPARTMENT OF CITY PLANNING - TO REFORM ZONING CODES - TO STOP INAPPROPRIATE + IRRESPONSIBLE OVERSIZED DEVELOPMENT.

----- Forwarded message -----

From: Ivan Bart <[Ivan.Bart@img.com](mailto:Ivan.Bart@img.com)>

To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>

Cc: "[rbearak@brooklynbp.nyc.gov](mailto:rbearak@brooklynbp.nyc.gov)" <[rbearak@brooklynbp.nyc.gov](mailto:rbearak@brooklynbp.nyc.gov)>, "[montgome@nysenate.gov](mailto:montgome@nysenate.gov)" <[montgome@nysenate.gov](mailto:montgome@nysenate.gov)>, "[simonj@nyassembly.gov](mailto:simonj@nyassembly.gov)" <[simonj@nyassembly.gov](mailto:simonj@nyassembly.gov)>, "[slevin@council.nyc.gov](mailto:slevin@council.nyc.gov)" <[slevin@council.nyc.gov](mailto:slevin@council.nyc.gov)>

Bcc:

Date: Wed, 19 Jul 2017 20:51:59 +0000

Subject: 80 Flatbush

Dear Ms. Maldonado--

80 FLATBUSH AVENUE

I am writing to express my deep concern about the proposed development of the site known as 80 Flatbush Avenue.

I have lived in Brooklyn my entire life and I was raised in Bensonhurst. The Williamsburg Savings Bank building and its clock hold a special place in my heart. As a young man, my dentist was in the building and I visited the banking hall numerous times with my grandfather who was a customer. Even from Bensonhurst we were able to use the clock to tell the time. I am currently lucky enough to live in the Williamsburg Savings Bank Building and people from all over Brooklyn constantly tell me how much their views of the clock mean to them.

Unfortunately this new development at 80 Flatbush threatens to block views of the clock from the west. Views from Brooklyn Heights, Cobble Hill, and Boerum Hill will all be affected. There is no attempt to preserve those sight lines with the design proposed. Other buildings, such as 330 Ashland Place made great effort to preserve views of One Hanson Place's clock because they recognized that it's unique importance to Brooklynites.

Also, a development of this scale is unsuited in the midst of a brownstone residential neighborhood. Specifically, I am concerned about exceptions to the current zoning requirements which the developer is requesting.

Removing the setback requirements will impact the amount of natural light reaching the street and neighborhood. Eliminating this requirement is unjustified.

This lot is not part of Downtown Brooklyn. It borders State Street which is a brownstone street. A development of this scale will forever change both State Street and also residential Boerum Hill and Fort Greene.

I am also concerned that the developer does not provide any economic justification in their EIS document for the 300% increase in FAR that they are requesting.

In fact, the primary benefit which the developer touts will not actually do much to improve school overcrowding. The 922 additional residential units proposed in by the development at 80 Flatbush could add as many as 510 students to the district. The current proposal only adds 370 seats leaving a net negative.

Clearly there are major negatives to allowing this developments to proceed as planned. I ask you to very carefully weigh and proposed benefits with the long term impacts to our neighborhood.

I am not against development of the site, I just feel the massing proposed is completely unsuitable for brownstone Brooklyn. Perhaps instead of the current proposal, the developer could build one or two smaller buildings on the Schermerhoorn side of the lot and keep the State street side of the street low rise, to match the character of the brownstone street? This would help create a better transition between downtown Brooklyn and Boerum Hill. There will also be less obstruction of One Hanson's clock.

Thanks for your review.

Yours sincerely,  
Ivan M. Bart



Ivan Bart President, IMG Models Worldwide

T: [212 253-8884](tel:2122538884) • F: [212 253-8883](tel:2122538883) • [ivan.bart@img.com](mailto:ivan.bart@img.com)

Twitter: [ivanmbart](#) • Instagram: [ivanmbart](#)

IMG Models • 304 Park Avenue South, Penthouse North • New York, NY 10010

---

**From:** Hormuz Batliboi <hormuz.batliboi@gmail.com>  
**Sent:** Monday, July 10, 2017 1:10 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 FLATBUSH AVE - COMMENTS TO DRAFT SCOPE OF WORK FOR EIS  
**Attachments:** ECF80Flatbush-scopingcomments-Batliboi.pdf; ECF80Flatbush-scopingcomments-Batliboi.docx

Dear Ms. Maldonado,

Please see attached letter with comments.

We had met at June 28 public scoping session and am happy to talk further in person.

Thanks,  
Hormuz

HORMUZ BATLIBOI, AIA, NCARB  
646.436.6239

<b>Hormuz Batliboi, AIA, NCARB</b>
557 Atlantic Avenue; #5B
Brooklyn, NY 11217
<a href="mailto:hormuz.batliboi@gmail.com">hormuz.batliboi@gmail.com</a>
July 10, 2017
Jennifer Maldonado
Executive Director
New York City Educational Construction Fund
30-30 Thomson Avenue, Fourth Floor
Long Island City, NY 11101
<a href="mailto:KhalilGibran80Flatbush@schools.nyc.gov">KhalilGibran80Flatbush@schools.nyc.gov</a>
<b>RE: 80 FLATBUSH AVE - COMMENTS TO DRAFT SCOPE OF WORK FOR EIS</b>

Dear Ms. Maldonado,

I am a 11-year resident of the block directly across from this proposed development project. I am also an Architect familiar with large-scale projects, and a parent of two young children. I write to you in all of the above capacities - resident, professional architect & parent - to register my strong reservations and concerns about this development project.

I believe that the points below should be considered in the scoping plan for the Environmental Study.

**Study Area & Areas of Analysis**

- Given the scale and size, a Study Area of one-half mile should be accounted for, not the 400 feet in the proposal.
- A project of this scale must include analysis of all 18 areas of analysis in the City Environmental Quality Review (CEQR) Technical Manual. (In the scoping presentation, natural resources, sanitation/ sewer services, and energy are excluded)

**General Context/ Height/ Renderings**

- The graphic materials in the proposal should accurately represent the heights of the proposed tower and the existing context (including One Hanson Place and the more recent high-rise developments along Flatbush Avenue), which they currently do not.
- Having prepared EIS documents in the past, I recommend that the EIS include a comparative analysis that graphically shows elevation height of proposed buildings compared to similar scale buildings in Brooklyn and Manhattan.
- Additionally, consideration must be given to include views looking down State Street from further away.

**Shadow Study/ Light & Glare/ Wind**

- A comprehensive shadow study must be performed to show effect in the broader study area (minimum 1 mile radius).
- An accurate analysis of increased glare due to reflection from glass exterior walls, and effect on ambient temperature in the surrounding area must be included.
- A wind study must be included showing effect of taller building on wind patterns at the street level.

### **Zoning & School-age population**

- This is not an as of right development - site is currently zoned as C6-2 but seeks to triple the available FAR under C6-6. Comparing the "with action" to "no action" scenarios in table 1 of EIS Scoping, the number of school-age children will increase by building 3 times as much residential GSF, and will negatively impact the available school seats when adjusting for the fact that half of the school GSF is simply replacing an existing school. How has this impact been considered?
- What is the justification for allowing 3 times as much area to be built when it does not actually solve the school seat shortage for District 15?

### **Loading Dock & Zoning Requirements**

- The proposed loading dock on State Street appears to be in violation of zoning which does not allow entry or exit to a loading dock within 30 feet of a residential district boundary. This also applies to residential boundary at Third Avenue.
- In addition the proposal does not clarify how a loading dock is physically possible given traffic patterns and required dimensions.

### **Transitional area for high-rise/ height limitation area**

- The scale and height of the proposed towers are not in keeping with the spirit of the Special Downtown Brooklyn District, which calls for transitional areas in between commercial and residential zoned areas.

### **Construction logistics / mitigation**

- Full construction logistics plan needs to be shown for each phase, showing staging and access.
- Where will crane(s) and other equipment be located during construction?
- What will be the impact on traffic (including lane closures) on a temporary basis?

### **School logistics/ Traffic**

- Where will school buses drop off/ pick up? How will this impact traffic (lane closures) on a permanent basis?
- Address pedestrian safety and impact on traffic with peak rush-hour and school crossings.
- As a result of new traffic patterns following the construction of Barclays Center, traffic at the intersection of State Street and Third Avenue has worsened.
- Impact to traffic needs to be analyzed including a cumulative effect of all recent new developments.

### **Subways**

- Subway analysis needs to be included. Project will generate residential and office commuters. Ridership has increased significantly with every new development.

### **Alternatives analysis**

- Study needs to include more than just the "no action" alternative.
- Should include, but not limited to alternative redevelopment proposals, alternate massing site plan/ footprint, heights; redevelopment under existing zoning; redevelopment under current use.

Lastly, I attended the public session on June 28 and know that many people were either not aware of the project or the were unable to attend. Those who were not able to attend have till today to submit comments in writing, which given the

July 4th holiday in the middle of this period, does not allow enough time to fully review & respond to a scoping document of this scale. I understand that State Senator Velmanette Montgomery, Assembly Member Jo Anne Simon, and Council Member Stephen Levin have sent you a letter requesting to extend the response period to July 28 2017 and I would strongly concur with their request.

I am certain that many of my comments above have already been brought to your attention, and I urge you to take these into consideration.

Sincerely,

A rectangular box with a black border, used to redact the signature of the sender.

**Hormuz Batliboi, AIA, NCARB**

**Hormuz Batliboi, AIA, NCARB**  
557 Atlantic Avenue; #5B  
Brooklyn, NY 11217  
[hormuz.batliboi@gmail.com](mailto:hormuz.batliboi@gmail.com)

July 10, 2017

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](mailto:KhalilGibran80Flatbush@schools.nyc.gov)

**RE: 80 FLATBUSH AVE - COMMENTS TO DRAFT SCOPE OF WORK FOR EIS**

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- Subway analysis needs to be included. Project will generate residential and office commuters. Ridership has increased significantly with every new development.

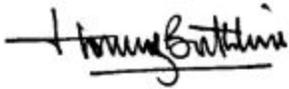
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I am certain that many of my comments above have already been brought to your attention, and I urge you to take these into consideration.

Sincerely,

A handwritten signature in black ink that reads "Hormuz Batliboi". The signature is written in a cursive style with a horizontal line underneath the name.

**Hormuz Batliboi, AIA, NCARB**

----- Forwarded message -----

From: John Baumann <[baumhacker@gmail.com](mailto:baumhacker@gmail.com)>

To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>

Cc:

Bcc:

Date: Thu, 27 Jul 2017 15:01:34 +0000

Subject: 80 Flatbush EIS Scoping comments

Regarding the Environmental Impact Study for the proposed 80 Flatbush development:

The density is excessive for the neighborhood it is in, my neighborhood, Boerum Hill.

The EIS is too limited in scope. For such an enormous project a study area of 400 feet is laughably small. At least a half-mile radius is needed to fully assess the impacts.

The EIS should include drawings and elevations of the No Action plan as well as a comparison elevation of heights of all buildings over 12-stories in the study area.

The development does not include any open space for the community. While green space is shown on the roofs of the schools, they are small and may not be accessible to the public.

John Baumann  
215 Bergen St  
Brooklyn 11217

-----Original Message-----

From: C [<mailto:cbinny@icloud.com>]

Sent: Tuesday, July 04, 2017 10:38 AM

To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>

Cc: CB <[cbinny@icloud.com](mailto:cbinny@icloud.com)>

Subject: 80 Flatbush

I just learned that Alloy (who the heck are they??) plans to build a 74-story tower at Flatbush and State. Is this true?

I am 100% opposed to this. I have lived in Brooklyn since 1999, half my life. Wherever I've lived in the borough, from Williamsburg to Park Slope to Cobble Hill and now, Ft. Greene, I have always had a view of the Williamsburgh Savings Building and its clock tower. It is one of very few iconic buildings of historical significance still standing among these soulless, hideous glass and steel monstrosities that recently began to scar the Brooklyn skyline.

Not only is the building's height and design as proposed completely out of context with neighboring building -- and entire NEIGHBORHOODS -- it would block the view of the WSB from thousands of apartment buildings and houses; it would swallow the only treasured "skyscraper" that speaks to Brooklyn's rich past.

If you and these unknown, inexperienced developers think you can triple the FAR of this garbage just by virtue of rehousing one school and building a second one -- schools that could be located elsewhere-- you are wrong. Be prepared for a fight that will rival the opposition to Ratner's development of the Atlantic Yards a decade ago. The locals are now wealthier, better educated, better organized and better able to protect our own investments and quality of life.

Respectfully,  
Chris Benfante  
101 Lafayette Ave. 2J  
Brooklyn, NY 11217  
[chrisbenfante@gmail.com](mailto:chrisbenfante@gmail.com)

Sent from my iPhone

---

**From:** Lula Blackwell-Hafner <lula.blackwellhafner@gmail.com>  
**Sent:** Thursday, July 27, 2017 6:20 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 Flatbush

Please do not allow this project to continue without the consent of the community. The problems associated with it, as pointed out by groups like the Boerum Hill community, are significant. This area is not, and should not accommodate, high rise development on the edge of brownstone Brooklyn. Everything about that is bad planning in an historical and healthy neighborhood.

Lula Blackwell-Hafner

Sent from my iPad

---

**From:** Mark Bodie <mbodie@hotmail.com>  
**Sent:** Friday, July 28, 2017 3:32 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 Flatbush comment

**We welcome the schools and the affordable housing but not if it overwhelms our neighborhood even further.**

- This development is located in Boerum Hill not downtown therefore the density is excessive.
- Locating the tallest tower in Brooklyn next to low-rise residential buildings is a violation of transitional zoning and design context.
- The study area of 400-feet is inadequate to study all the indirect impacts, therefore a **half-mile** radius is needed.
- For a more accurate and informed study, the EIS should include drawings and elevations of the No Action plan as well as a comparison elevation of heights of all buildings over 12-stories in the study area.
- The development does not include any open space for the community. While green space is shown on the roofs of the schools, they are small and may not be accessible to the public.

There must be a better way.

---

**From:** Ellen Bowin <ellenbowin@aol.com>  
**Sent:** Friday, July 28, 2017 2:42 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 Flatbush

Dear Ms. Maldonado

I am writing to you to express concern regarding the project at 80 Flatbush Avenue. It is unreasonable to overwhelm the small well-functioning community of Boerum Hill with this massive development that violates established zoning and design principals. It seems likely that the area of study is not as broad as it should be (one half-mile) to adequately assess the impact of the proposed construction.

The loss of light and air by neighboring buildings is essentially an uncompensated taking and likely to diminish both the value of the affected homes, their owners enjoyment of their properties and the tax base thereof. Important goals like affordable housing and truly integrated, high functioning schools will not be achieved or sustained if projects of excessive density degrade the quality of life in and around the subject community.

Accordingly, the area of study should be increased, this will I believe show that the project should be scaled down and green space for the Boerum Hill community should be included.

Sincerely,

Ellen Bowin

Boerum Hill

---

**From:** Al Bozzuffi at Remote x 8785 <ABozzuffi@matson.com>  
**Sent:** Friday, July 28, 2017 2:04 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 Flatbush Scoping Comments

Attention: Jennifer Maldonado, Executive Director  
New York City Educational Construction Fund  
30-30 Thomson Avenue, Fourth Floor  
Long Island City, NY 11101

Dear Ms. Maldonado:

As a resident of Boerum Hill I am writing to express my opposition to the 80 Flatbush development.

- This development is located in Boerum Hill not downtown therefore the density is excessive.
- Locating the tallest tower in Brooklyn next to low-rise residential buildings is a violation of transitional zoning and design context.
- The study area of 400-feet is inadequate to study all the indirect impacts, therefore a **half-mile** radius is needed.
- For a more accurate and informed study, the EIS should include drawings and elevations of the No Action plan as well as a comparison elevation of heights of all buildings over 12-stories in the study area.
- The development does not include any open space for the community. While green space is shown on the roofs of the schools, they are small and may not be accessible to the public.

I am outraged by this ridiculously large twin tower proposal. The City of New York should not be selling our quality of life to real estate developers in order to cover up NYC's inability to properly budget and fund schools and affordable housing.

Sincerely,  
Alfred Bozzuffi  
159 Bergen St  
Brooklyn NY 11217

NOTICE: This message, including any attachments, is intended for the use of the party to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure. If you are not the intended recipient, any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please contact the sender immediately by reply e-mail, and delete the original and any copies of this message. It is the sole responsibility of the recipient to ensure that this message and any attachments are virus free.

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From: Enid Braun [<mailto:enidbraun@gmail.com>]  
Sent: Friday, July 14, 2017 1:49 PM  
To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>  
Subject: 80 Flatbush Scoping Comment

Enid Braun  
116 Adelphi Street  
Brooklyn, NY 11205

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](mailto:KhalilGibran80Flatbush@schools.nyc.gov)

July 14, 2017

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

July 13, 2017

Submitted via email

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**From:** Matt Brown <matt@bicyclematt.com>  
**Sent:** Friday, July 28, 2017 2:00 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 Flatbush Scoping - Public Comments

To Whom It May Concern:

As a resident of Boerum Hill ON State Street, I am very concerned about the size of the project proposed for 80 Flatbush.

The size/scale/scope of this development is completely out of character with **Brownstone** Boerum Hill. This is a residential neighborhood--not Downtown. Your study area did not even include our block, even though traffic tie-ups will string all down the block during construction and during occupancy.

The EIS MUST include drawings and elevations of the No Action plan as well as a comparison elevation of heights of all buildings over 12-stories in the study area.

Furthermore, unlike many other local projects, there does not seem to be an adequate contribution of public space for the size of this project.

Please provide a wider analysis before any decisions are made on this.

Sincerely,

Matthew B. Brown  
Wayne Chang  
368 State Street, Apt. 5  
Brooklyn, NY 11217

----- Forwarded message -----

From: Erik C <[eriksl2@yahoo.com](mailto:eriksl2@yahoo.com)>

To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>

Cc: "[slevin@council.nyc.gov](mailto:slevin@council.nyc.gov)" <[slevin@council.nyc.gov](mailto:slevin@council.nyc.gov)>, "[rbearak@brooklynbp.nyc.gov](mailto:rbearak@brooklynbp.nyc.gov)" <[rbearak@brooklynbp.nyc.gov](mailto:rbearak@brooklynbp.nyc.gov)>, "[simonj@nyassembly.gov](mailto:simonj@nyassembly.gov)" <[simonj@nyassembly.gov](mailto:simonj@nyassembly.gov)>

Bcc:

Date: Thu, 20 Jul 2017 07:28:13 +0000

Subject: My comments RE: 80 Flatbush

Hi, I'm a resident of 1 Hanson Place in Bk. Greene since 2010 and was born in NYC in the 70's.

I strongly oppose the size of the 80 Flatbush project as it will immediately outbalance the local schools. My understanding is that for 112 stories about 500 students will be added to the local school system and the school in the building wouldn't even be able to handle that many. Not to mention the impact it would have on Brooklyn as a whole. Flatbush has turned into a corridor of modern residential towers, each more ugly than the next and Downtown Brooklyn is becoming overcrowded.

I hope you reconsider the size of the tower and keep it around the expected maximum of 34 stories. I'm in agreement that more housing and schools are needed. But one building changing the entire local landscape of this beautiful area just shouldn't happen.

Thanks for your consideration,

-Erik Cabetas-

1 Hanson Place #24A

-----Original Message-----

From: Yana Calou [mailto:[yana.calou@gmail.com](mailto:yana.calou@gmail.com)]

Sent: Thursday, July 27, 2017 3:20 PM

To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>

Subject: No on Flatbush avenue tower.

Dear Mr. Gibran,

As a ten year Brooklyn resident living two blocks from Flatbush Avenue, I urge you to record my firm NO comment on the construction of a tower that would lead the way in Brooklyn becoming a nightmare of steel, blocked views, towers pushing out those of us who live here, and ruining our neighborhoods. Brooklyn is not Manhattan and it's clear that we do not want this here.

Yana Calou

**Linda Caracciolo**

463 State Street, Brooklyn, NY 11217

917-734-0269

[linrc1@me.com](mailto:linrc1@me.com)

## **80 Flatbush Scoping Comments**

The following pages set forth my comments on the public scoping process and the actual scope of the 80 Flatbush development.

For your convenience, I have separated this response into chapters associated with the sections and tasks presented in the draft document and placed my specific scope comments in boldface type within those chapters.

*As background, I have been a resident of Brownstone Brooklyn since 1989, the last 20 years as a homeowner on the 400 block of State Street. My husband and I live here with our 14-year-old daughter, who attends school in downtown Brooklyn. Our property line is just 140 feet – a half-minute walk away – from the proposed 74-story tower.*

### **PUBLIC PROCESS COMMENTS**

Irregularities in the public scoping process warrant attention. Specifically, staff members of the public relations consultant for the developer were disruptive during the Public Scoping Meeting, out of sight of the sponsoring agency and the developer. An independent monitor should be appointed for future public meetings so that the public is allowed to participate in the process unencumbered.

### **TASK 2: LAND USE, ZONING, AND PUBLIC POLICY**

Development has trumped rational public policy in New York City.

The precedent set by this project is a dangerous one: with the promise of new schools and affordable housing, developers will be rewarded with maximum zoning accommodations in otherwise completely inappropriate locations, and in return, profit handsomely. However, this particular scenario it is based on flawed assumptions, creative statistics, and an RFI process hidden from public view.

There is a real need for schools in Districts 13 and 15 but the more the city enables unbridled development, the more that demand will increase. This project is just a drop in the bucket. There is a case to be made that 80 Flatbush, once completed, would

alone fill the new elementary school or most of it. And the enhanced capacity lauded in plans for a new Khalil Gibran School sees only a net increase of 38 seats; let's remember that the school had many more students when it housed the Metropolitan Corporate Academy only several years back.

Messaging regarding the decrepit state of the physical plant of Khalil Gibran is somewhat contradicted by the results of a *2015-2016 Condition Assessment Survey* posted on the DOE website. But even if this messaging is accurate, the city certainly has the budget to upgrade the school without this undue burden on the community. Even an over-build for the school would be preferable to the 80 Flatbush scheme.

Moreover, the statistics presented for school seat needs are misleading. There are sizable vacancies in schools such as PS38; why is development a more appropriate remedy than good management? In addition, the SCA is planning school construction in these Districts, including the 436-seat annex that will replace the trailers at PS32, the new 180-seat pre-k facility on Ninth Street and Third Avenue, and others. How have these statistics been melded into the formula to determine overall seat needs?

The city needs a rational plan to build schools, not one that violates long-established zoning parameters for residential and transitional neighborhoods. A good start would be to change policy so that after a certain density is achieved, developers would be required to set aside space for schools: but only in areas that can accommodate them. And that needs to start happening today.

Since its founding, the New York City School Construction Authority (SCA) has been tremendously effective in planning and executing its capital improvement and capacity initiatives. There is no reason to believe that with deep community collaborations, it cannot be as successful in developing strategies to find real estate, even in this most difficult market. I would gladly offer my time to work with the SCA to help create, market and broaden participation in such a promising coalition.

It is also important to note that should a recession, housing glut, or downturn in the real estate market occur in the next several years—a likely scenario, in fact—the affordable housing may never be built. How will the financial models for the project, including tax abatements, accommodate this possibility?

Lastly, the study area proposed in the draft scoping document is not sufficiently wide in scope considering the project's enormous impact on the surrounding communities.

***Scope Comments on Land Use, Zoning, and Public Policy:***

**Task 2 of the DEIS must address the following:**

- **The area within a ½-mile radius of the site, considering the tremendous impacts 80 Flatbush will have on the Boerum Hill and Fort Greene communities.**
- **The precedent of too-tall, too-dense development in a neighborhood that cannot accommodate either impact and what that means for the future of zoning and public policy in New York City moving forward.**
- **How tax abatements and zoning variances are approved for projects that are not in the best interest of the communities they impact.**
- **How tax abatements and zoning variances are approved for quasi-public projects that lack a transparent bidding process and adequate public input.**

**TASK 3: SOCIO-ECONOMIC CONDITIONS**

*Small Landowners: Indirect Business Displacement* — The protracted construction period, with a strong probability of after-hours construction (noise, vibration, dust, inconvenience) and traffic disruptions (trucks, emergency responders, lack of parking) will likely impact the ability of the numerous small landlords and developers in the area to consistently lease their properties.

The ability of property owners to sell their holdings will surely be impacted as well, at least during the uncharacteristically long construction period envisioned for this two-phase development.

Moreover, there will be no tax relief for these homeowners, landlords, and developers, thereby adding to their financial burden.

***Scope Comments on Indirect Business Displacement:***

**Financial impacts and recommended concessions to small landlords, homeowners, and other landowners within a ½ mile of the project warrant a detailed assessment in the Task 3 of the DEIS.**

## **TASK 4: COMMUNITY FACILITIES AND SERVICES**

*Fire Protection* — The proposed action would directly affect the physical operations of, and access from, Engine Company 226 on State Street, and would create a sizeable new, ultra-high-rise residential neighborhood—20 stories higher than nearby developments (including the Hub, 300 Ashland, etc.), requiring specialized fire-fighting equipment and training—where none was necessary before.

### ***Scope Comments on Community Facilities and Services—Fire Protection:***

**Fire protection services during and after construction of the project warrant a detailed assessment in the DEIS:**

- **Engine Company 226 response times are already challenged by existing traffic on State Street, Nevins Street, Third Avenue and surrounding traffic arteries, in part due to traffic mitigation plans relating to the Barclays development, as well as the intensity of construction activities in the neighborhood.**
- **The potential for 80 Flatbush construction-related crane locations or lane closures on State Street, Third Avenue or Schermerhorn Street must be modeled in terms of Engine Company 226 response times to neighborhood emergencies.**
- **Engine Company 226 is not equipped to handle super-high-rise fire emergencies in terms of equipment or staff size. Response times and service availability from the Tillary Street Fire Station and any other more robust stations proximate to the site must be assessed.**

*United States Postal Service* — The neighborhood of the proposed development (Zip Code 11217) lacks a full-service Post Office. The current strain on the postal system is reflected in a preponderance of postal deliveries to residences occurring after 5 PM.

### ***Scope Comments on Community Facilities and Services—Postal Service:***

**An analysis of impacts on the United States Postal Service in the 11217 Zip Code must be included in Task 4 of the DEIS document.**

## **TASK 6: SHADOWS**

*Shadows* — If it were constructed today, the larger tower of 80 Flatbush would be the 12<sup>th</sup> tallest building in New York City; over the course of the year, the building would create extremely long shadows—well into other neighborhoods—even were it not fitted out with its particularly tall bulkhead. There will be a profound impact on sun-sensitive front and rear gardens, as well as whole households on blocks of historic homes in Boerum Hill along State Street, due West of the proposed towers, as well as in Fort Greene. In winter months, this will likely include Fort Greene Park, Long Island University Athletic Center, and Brooklyn Technical High School.

### ***Scope Comments on Shadows:***

**The study area must include the extent of all shadows created by the full height of the two towers, including proposed bulkheads if they are not sufficiently perforated to allow sunlight penetration. For the taller structure, this will be 986 feet.**

**This means that the shadow study should be expected to exceed the geographic boundaries set for other elements of the DEIS.**

## **TASK 7: HISTORIC AND CULTURAL RESOURCES**

*Historic Resources* — While the project is touted as being located in Downtown Brooklyn, most of the property is actually historic Boerum Hill along the southern half of Third Avenue and along State Street. Many of the buildings surrounding the project, including those on the 400 and 500 blocks along State Street, have considerable historic importance. Most of the structures were built in the 1850s through the 1920s, and could easily be eligible for historic designation; some already enjoy landmark status.

The extreme height envisioned for the tower—especially considering the massive bulkhead—is unprecedented for a historic brownstone neighborhood, or in fact, any low-rise residential neighborhood within New York City. This tower is proposed to be located only 60 feet from the building line of a 19<sup>th</sup> century brownstone on State Street and Third Avenue, across State Street from other historic brownstones, and directly across Flatbush Avenue from the iconic One Hanson Place.

Also unprecedented is the density of the project considering the necessity to place entrances and some loading docks for the oversized buildings and two schools on narrow, historic residential blocks.

***Scope Comments on Historic and Cultural Resources:***

**The assessment of the proposed project’s potential to result in any visual and contextual impacts on the architectural resources noted above must be considered for a radius of at least ½ mile from the site.**

**TASK 8: URBAN DESIGN AND VISUAL RESOURCES**

*Urban Design and Visual Resources* — Entirely out of context with the scale of the existing Boerum Hill neighborhood in which its two major boundaries lie, and towering 20+ stories higher than even The Hub and the iconic One Hanson Place, 80 Flatbush would make substantial alterations to the streetscape of the neighborhood by noticeably changing the scale of buildings, and obstructing view corridors of, and competing in the skyline with, the historic and iconic One Hanson Place.

Moreover, the current zoning of the small, irregularly shaped site thoughtfully requires setbacks, which are essentially eliminated in the design of the two towers; only 60 feet separates the larger tower from a historic brownstone at the corner of State Street and Third Avenue. The small, recessed entryway does not constitute an appropriate setback for a building of such menacing height.

Therefore, the project requires actions that would result in physical changes to the project site well beyond those allowable by existing zoning and which could easily be observed by a pedestrian from street level.

***Scope Comments on Urban Design and Visual Resources:***

**A detailed analysis of urban design and visual resources, within a radius of ½ mile from the site, is required due to the unprecedented scale and density of the proposed development in terms of its location not in Downtown Brooklyn, as marketed, but in Boerum Hill, as actually sited.**

**This analysis must include a rational assessment of the elimination of setbacks in the up-zoning request.**

**TASK 10: WATER AND SEWER INFRASTRUCTURE**

*Water and Sewer Infrastructure* — The draft scope document does not address the aging water and sewer infrastructure in the neighborhood.

***Scope Comments on Water and Sewer Infrastructure:***

State Street and its environs are part of one of the oldest neighborhoods developed in Brooklyn. The water and sewer systems under the local streets are aging, fragile and prone to damage. The DEIS must include an analysis of these systems, including the water system valve plant adjacent to the site and security provisions for access points to the water system (hatches, stairwells, manholes) to prevent the possibility of tampering.

**TASK 11: TRANSPORTATION**

*Traffic* — The draft document does not specifically address the project’s location within the critical “jug-handle” of the Sam Schwartz Engineering firm’s traffic mitigation for the Barclays Center or the general intensity of traffic in the vicinity.

At the very moment the Barclays mitigation plan’s traffic pattern changes were implemented, the quality of life in the neighborhood deteriorated. The neighborhood experiences crushing traffic congestion. Numerous circling limousines and for-hire vehicles compound the congestion during events at Barclays should they not be idling illegally at fire hydrant locations, crosswalks, and bus stops. Event-goers in cars also overwhelm the local arteries in search of free (typically unavailable) curb parking because the Barclays plan specifically excluded provisions for adequate parking for such events, as it did accommodations for the queuing and idling of limousines and cabs.

Further constricting the local streets are commercial and residential dumpsters and roadway areas blocked off to serve as laydown areas for construction materials or equipment storage; this situation has proven to encourage double-parking.

The net effect is that traffic is unbridled in the neighborhood much of the time. The biggest impact is on emergency services—Engine Company 226 and ambulances battle with traffic daily. As such, the safety, security, and well-being of residents and businesses in the vicinity of 80 Flatbush are already at risk *prior* to development of the site.

***Scope Comments on Traffic:***

**The following should be addressed in the scope of the DEIS:**

- **Given the tight street grid and how, therefore, some intersections will affect up and downstream traffic operations, we expect to see the developer have its consultant develop traffic simulation models for all peak travel periods to ascertain if queuing will develop in the study area.**

- **The traffic model should make use of VISSIM (not SYNCHRO) as the choice software in the traffic engineering industry as the visual tool to review and identify where congestion and undue vehicle backups will occur.**
- **These models should span the entire Barclay’s Center traffic mitigation area (that is, from Fourth and Third avenues north to Flatbush, including the affected section of Atlantic Avenue), State Street from Bond Street east, and streets east and north of Flatbush Avenue in the affected area, into Fort Greene.**
- **The traffic studies should be conducted for peak weekday and weekend events at the Barclay’s Center and typical weekday AM and PM peak commuting hours.**
- **NYCDOT typically does not allow more than 5 to 7 seconds of green cycle time to be shifted from one intersection approach to another. Please confirm that the signal timing mitigation is within acceptable DOT standards.**
- **Given 80 Flatbush will become a destination in its own right, the trip generation analyses should have no credit (trip reduction) for pass-by trips. Please confirm this.**
- **In the analysis of parking, the ¼- and ½-mile radii should be examined per the *CEQR Technical Manual*. However, given the boundary street is Flatbush Avenue and that few if any people will park east of Flatbush to cross over to the west side where this new development is to be situated, please confirm that this approach is used in the analysis of on-street parking.**
- **Given that on-street parking is at a premium in the general area, what mitigation is being considered for the inevitable on-street parking shortfalls to be identified?**

*Timing of Traffic Counts* — It has been observed that traffic counts were taken midweek on State Street and Third Avenue *after* private schools were closed, many residents began their vacations, and the neighborhood was in quieter “summer mode” when traffic volumes are lower than the Spring or Fall.

Therefore, there is a serious concern regarding the validity of the conduct of traffic, parking, and pedestrian counts associated with environmental studies being conducted for the 80 Flatbush development. Although NYCDOT allows counts to be conducted up to and including Wednesday, June 28, given that public schools are still open for session,

this particular area of Brooklyn is chock-full of private schools of many sizes that have been closed for about two weeks preceding the commencement of the project's count program. Furthermore, many public schools, while remaining open, have significantly reduced schedules that allow students to leave the premises to return home much earlier in the day.

The result of these two school-related operations conditions will result in atypical travel patterns and will not be representative of normal midweek conditions. Moreover, the data that were collected cannot simply be adjusted by application of a seasonal adjustment pattern because both the volumes are likely lower and the hourly patterns are different.

***Scope Comments on Transportation—Timing of Traffic Counts:***

**The DEIS will require:**

- **All-new travel data to reflect typical school-year operations (i.e., after mid-September) and associated travel patterns are thus needed to proceed accurately through the DEIS process.**
- **Traffic counts taken during peak events at Barclays within a ½ mile radius of the site to reflect actual traffic network impacts.**
- **All new traffic data to support air and noise quality analyses. It is also noteworthy that the conduct of air and noise quality analyses relies on traffic volume inputs, as well as specific in situ data collection for their model conduct. Thus, these analyses are also faulty in their underlying supporting data and will require all-new data to proceed.**

*Transit* — Open any local newspaper and you can read about another challenge faced by customers of New York City's passenger rail transportation and surface transit networks.

The subway lines servicing the Barclays Center-Atlantic Avenue Station, Nevins Street Station and Hoyt-Schermerhorn Station are already experiencing significant delays and service failures due to aging infrastructure, years of deferred maintenance, and unprecedented ridership.

Moreover, service issues at New York Penn Station are commonplace, forcing Long Island Rail Road customers to find alternate means of access into the city—many changing their commuting routines to instead use Atlantic Terminal. The Penn Station “Summer of Hell” scenario will certainly contribute to this phenomenon much like the

transit strike of the early 1980s led to the widespread adoption of athletic footwear for commuting: once commuters to lower Manhattan get used to traveling through Atlantic Terminal, they will be more likely adopt this practice for the long-term. There can be no doubt that this will create even greater passenger loads on the already overburdened subway system.

***Scope Comments on Transportation—Transit:***

**The transit analysis must include:**

- **A focus on the three separate subway stations proximate to the site. The project site is served by not one, but *three* NYCT subway stations: Barclays Center-Atlantic Avenue, Nevins Street, and Hoyt-Schermerhorn. In fact, a large number of users will choose to use the relatively small Nevins Street Station rather than cross Flatbush (because it is much easier to access and egress); others will travel to Hoyt-Schermerhorn for access to the A/C/G lines that do not serve the Barclays Center-Atlantic Avenue Station.**
- **Line-haul capacity and travel demand analyses incorporating ridership modeling, for all three stations in proximity to the site, considering all subway lines serving them.**
- **Key individual subway station elements must be included in analyses, including all fare-barriers, all entry stairwells, and platform stairwells.**
- **All bus lines serving the site must be studied both at the closest stops and at the peak-load points to identify potential impacts. Among these lines are the B41, 63, 67, 69, and 103; there may be other Fulton Street lines that are potentially affected based on ridership forecasts that should be part of this overall DEIS.**
- **Full analysis of the impacts of projected population increases in the neighborhood, bearing in mind the extraordinarily large number of residential units currently under construction within ½ mile of the project site, as well as the projected increase in the number of Long Island Rail Road passengers taking subways to and from Atlantic Terminal.**

***Parking*** — On-street parking is at a shortfall in the vicinity of the project site, aggravated by the Barclays traffic mitigation noted above. The impact of this deficit in parking spaces can be seen in the number of cars parking illegally: some double-parked, some in no-parking or standing zones, and others blocking hydrants, crosswalks, loading zones, bus stops, or bike lanes. This is compounded by undue circulation of vehicles in search of the non-existent curb space. It can also be seen in the astronomical rise the

cost of off-street parking nearby, the monthly fees well out of the reach of a majority of local residents and workers.

Virtually all of the existing parking surrounding the site will be eliminated to accommodate construction operations and eventually, building access, loading dock operations, and bus drop-off and pick-up practices on Third Avenue and State Street, both narrow, congested roadways. This will exacerbate an already bad situation.

The during-construction scenario will represent another untenable condition: a building of this size will generate significant volumes of worker vehicles and delivery trucks. Past EISs note that such conditions are temporary and thus dismiss potential impacts. Such specious technical approaches thus avoid the unmanageable traffic conditions that are imminent.

The current administration has rewarded a number of New York City teachers with parking placards, though it is the practice of NYCSCA not to provide off-street parking space. Therefore, another factor compounding the pressure on parking availability will be demand generated by teachers at the two schools envisioned for the site.

Likewise, Citi Bike locations have eliminated many on-street parking spaces in Boerum Hill and Downtown Brooklyn. The current plan for car-share spaces in those two neighborhoods will further decrease available curb space for any user, be they motorists searching for open curb spaces or delivery services seeking momentary spaces to drop off goods to local businesses.

It is important to remember that the design of Barclays purposely undersized off-street parking accommodations and holding areas for limousines and black cars. Accordingly, some of the biggest stressors on parking availability are the large number of scheduled events at the Barclays Center. In its first year alone, the Barclays Center ranked as the number one U.S. venue in terms of ticket sales. Its own website boasts, "The success of these events has made Barclays Center one of the most popular arenas in the world, ranked top five globally in 2015 ..."

The driving theory in developing the parking scheme for Barclays has not proven true: as it turns out, most event-goers have not been persuaded by the lack of sufficient on-site parking to use mass transit to travel to and from the arena; instead, they take limousines, cabs or Uber, or seek to park for free deep into the surrounding neighborhoods. And so, in reality, each event generates a massive influx of vehicles in search of on- and off-street parking, as well as limousines and black cars seeking areas to idle for the duration of the event. And they do so in the vicinity of 80 Flatbush for its superior access to Flatbush Avenue.

***Scope Comments on Transportation—Parking:***

Due to the fact that events at the Barclays Center have an enormous impact on neighborhood parking availability, the off-street parking supply and utilization analysis to be conducted in Task 11 must cover the area within a ½ mile radius of the project site.

To accurately gauge the parking shortfall, the parking analysis must consider:

- The impacts of 80 Flatbush during construction and after full build-out
- The Barclays traffic mitigation and resultant parking impacts
- Parking for teachers
- Parking for large numbers of construction workers on this and other nearby developments
- City Bike parking locations
- Future provisions for car-share parking locations, a growing trend

**TASK 14: NOISE**

Noise — The neighborhood’s negative and prolonged experience with noise generated from perforated high-rise building bulkheads proves the importance of this consideration.

The Hub at 333 Schermerhorn Street created a “tuning fork effect” and perceptible howl for a least six blocks surrounding the structure when wind speeds exceeded 15 miles per hour; at five miles per hour, the maddening ambient hum could be heard within residences on State Street without open windows. This issue has now been addressed but it took months and countless complaints on the part of the community to make that happen.

This is not an isolated incident: it was also experienced by residents and businesses in close proximity to the CitySpire Tower in Manhattan, a building not as tall as the tower proposed for 80 Flatbush.

Another concern would be the potential for noise generated by the rooftop playgrounds and green spaces.

***Scope Comments on Noise:***

**The DEIS must address potential noise generation by the bulkheads of both towers comprising both towers of the 80 Flatbush development.**

**It should also examine the noise generated from activities on the rooftop playgrounds and greenspaces in terms of its potential to impact existing sensitive receptors.**

**TASK 16: NEIGHBORHOOD CHARACTER**

*Neighborhood Character* — While this topic receives scant attention in the draft scope document, it is perhaps the most important and warrants considerable attention in the DEIS. The unprecedented juxtaposition of a project of extreme height and extraordinary density within a historic, four-story, residential neighborhood is, in the words of a widely-respected local politician, “a violation of the neighborhood and its citizens.”

Oddly, most of the site density is relegated to Boerum Hill, on two narrow streets, whereby the jarring collision with the neighborhood becomes the central urban design message.

The attempt to “preserve” two historic buildings is thinly veiled, another clever means to seek density beyond that which is appropriate for the site. Sadly, the graceful brick connection between the buildings is to be demolished and replaced with an ominous, non-contextual, super-tall glass tower—not counting the bulkhead, the 12<sup>th</sup> tallest building in all of New York City if constructed today—its base aggressively placed only 60 feet from a brownstone.

Let’s examine for a moment the adjacent Hub development at 333 Schermerhorn. It is large and imposing, set on an irregularly shaped lot, but is characterized by many setbacks and is removed from the residential neighborhoods surrounding it. Two major commercial thoroughfares bound its site; they are sufficiently long and wide to handle construction access and laydown as well as loading docks and entrances for the completed project. 80 Flatbush offers no such neighborhood accommodations.

The setback issue alone is an important one. Unlike the Hub, 80 Flatbush offers virtually no setbacks in its imposing towers—even though their bases directly abut low-rise residential buildings. It is critical to acknowledge that setbacks are thoughtfully called for in the existing zoning to protect the neighborhood character in the development of small, irregularly shaped lots.

Sadly, there are endless questions...but no adequate answers:

- How can already congested narrow residential streets accommodate loading dock operations and school bus drop-off, idling, and pickup?
- Consider the imposition of tens of thousands of pounds of solid waste that will be generated each week—where on State Street will it be stored and picked up?
- How will this contribute to the rat infestation that already plagues the neighborhood?
- How will the neighborhood handle the increased traffic and associated noise when the Barclays mitigation has already clogged our streets?
- How will the de-mapping of Schermerhorn at the plaza exacerbate this situation?
- Where will residents park their cars, already a huge challenge during the workday or when Barclays has events?
- How will the neighborhood survive the traffic, noise and vibration imposed by the protracted after-hours construction period with *a process that accommodates the needs of the existing school but not best interests of the thousands of residents surrounding the site?*

Schools are important; but it is a slippery slope to use school development based on fuzzy statistics as the carrot for developer profit. The more you develop, the more demand there is to build schools. It becomes impossible to keep up with the demand; once you get close, the demand skyrockets once again. Inappropriate zoning is not the solution to bridge gaps in previous city planning initiatives, runaway development, or a system that allows schools like nearby PS38 to operate at chronic under-capacity.

There is a good reason for rational zoning and urban design, one that acknowledges neighborhood character, scale and density. We like to hold ourselves above countries like China that bulldoze historic Hutong neighborhoods and flood historic cities in the name of development. Yet this is not a dissimilar trend. To triple the density of this cornerstone site is to set a dangerous precedent throughout New York City for unbridled development and ultimately, the destruction of precious historic neighborhoods.

***Scope Comments on Neighborhood Character:***

**Task 16 of the DEIS must provide a detailed, comprehensive analysis of the significant impacts of the imposition of the too-tall and too-dense 80 Flatbush development on the neighborhood character and quality of life for residents in historic, low-rise,**

**Boerum Hill—both during construction and once the site is fully operational. This must include a discussion of the following:**

- **Primary site location in historic Boerum Hill, not Downtown Brooklyn as cleverly marketed by the sponsoring agency, city, local business lobbying organizations and the developer. The southern border of Downtown Brooklyn is Schermerhorn Street, *not* State Street.**
- **Inappropriate close proximity to the low-rise historic homes and businesses.**
- **Unprecedented height, density, and massing of 80 Flatbush, considering existing zoning and the lot shape and borders (including two narrow residential streets). This must include a study of why the site density is concentrated at these two residential street boundaries, rather than the two commercial ones.**
- **Aggressive transformation of the skyline in the BAM Cultural District, obliterating view lines to the iconic One Hanson Place. The stubborn insistence that extreme height—which in this case would translate to a tower that would be the 12<sup>th</sup> tallest building in the City if constructed today—is preferable to other massing configurations is an affront to residents and business owners who invested in this neighborhood when no one else would.**
- **Lack of setbacks for towers. The current zoning calls for setbacks as an accommodation for higher density on small, irregularly shaped lots. The gratuitous concession of an indentation at the base of the taller tower does not qualify as a proper setback.**
- **Destruction of historic elements of the existing school building, to be replaced with a jarring, non-contextual and inappropriately tall glass tower.**
- **Increase in traffic in an area that already bears the full brunt of the Sam Schwartz Engineering Company’s traffic mitigation for the Barclays center, an area that experiences crushing congestion, and the noise associated with it, on virtually a daily basis.**
- **The transformation of narrow, residential State Street into an enormous loading dock, solid waste removal and school bus staging zone**
- **How the neighborhood will survive a protracted (6+ years) and likely after-hours, overnight and weekend construction scenario due to the need to keep the Khalil Gibran School operational**

- **Impairment of fire department and other emergency access through careless site layout that will place the burden of construction and once-built operations squarely on the two narrow thoroughfares: State Street and Third Avenue.**
- **How the plan will be impacted should NYCDOT rightly disapprove the de-mapping of the exit lane of Schermerhorn to Flatbush southbound**
- **Lack of community green space or green walls in the proposed scheme**
- **A rational, thoughtful, and unbiased plan for what the development could be as-of-right**

## **TASK 17: CONSTRUCTION**

Comments on Task 17 cover several sub-topics, as discussed below.

*After Hours Construction* — The requirement that the Khalil Gibran High School remain operational until the new facility is constructed may require that construction activities be restricted to non-school hours. Moreover, the project’s proximity to the Brooklyn Academy of Music (BAM) may also impact the construction window; in the past, BAM has required variances to halt nearby construction during performances and other events.

It is critical to note that at its closest point, the proposed 74-story tower is sited as close as 60 feet from contiguous blocks of brownstone residences. Moreover, the adjacent YWCA has 300 full-time residents; it does not have windows that offer sound attenuation and truck traffic on Third Avenue and Atlantic Avenue already creates considerable disruption.

### ***Scope Comments on Probable After-Hours Construction:***

**In Task 17 of the DEIS, the Construction Impact Assessment must examine, for the entire construction and commissioning period, the impacts of likely night and/or overnight construction and related operations (relating to the necessity of keeping the existing and future Khalil Gibran School operational) on the surrounding residential and business community. This must include:**

- **Financial impacts on the many small landlords in the neighborhood who may be unable to consistently lease their rental properties during this period.**

- **Financial impacts on residents who may have to temporarily relocate due to adverse noise and vibration impacts.**
- **Wellness and mental health impacts on residents subjected to long-periods of night construction, especially considering the at-risk population housed in a portion of the YWCA.**

*Construction-Related Impacts to Transportation Systems* — By virtue of the site location and configuration, the two primary thoroughfares for construction equipment access and locations are located in residential Boerum Hill, along Third Avenue and State Street, both narrow roadways with curb parking. This is exacerbated by the fact that the site lies in the jug handle of the Barclay’s Center traffic mitigation: virtually all northbound traffic from Third and Fourth avenues is channeled through Third Avenue—to Flatbush, to Schermerhorn, or on to Lafayette. This would be aggravated by the potential de-mapping of the Schermerhorn exit lane to Flatbush southbound as shown on all project renderings.

Construction-related activities, including truck traffic, materials deliveries, transportation for workers (legal and illegal street parking), almost certain long-term lane closures for construction operations and material laydown, and crane locations will likely have a devastating impact on traffic and parking availability for at least a ½ mile from the project. Events at Barclays already create gridlock on Fourth Avenue, west to Atlantic, and north on Third Avenue to Flatbush northbound.

***Scope Comments on Construction-Related Impacts to Transportation Systems:***

**A separate, detailed analysis must be undertaken, considering the myriad of critical traffic and transportation issues noted in the paragraph above. This must include an analysis of the ramifications of probable long-term lane closures on Third Avenue and State Street.**

**Because of the Barclay’s traffic mitigation pattern, this analysis must span a ½-mile radius of the site.**

**The NYCDOT Office of Construction Management and Control (OCMC) will need to be contacted and review the developer’s Maintenance and Protection of Traffic (MPT) plans *before* construction commences. We demand to be informed on DOT approvals and issued traffic stipulations.**

*Construction-Related Noise and Vibration* — As noted above, the need to keep the Khalil Gibran High School operational during construction and because of the

project's proximity to the Brooklyn Academy of Music, most construction will likely take place after hours, overnight, and certainly on weekends. The unprecedented proximity to a residential community, including myriad brownstones and small apartment buildings, the 300-bed YMCA, 333 Schermerhorn, 300 Ashland, and One Hanson Place make this a densely populated residential neighborhood.

Moreover, many of the residences along State Street are over 150 years old and have superstructures and delicate period details prone to damage by even the slightest vibration. This is a particularly important issue to consider as much of the construction is directly on the small, residential State Street and because the massive tower will rise only 60 feet from a brownstone in a contiguous line of residences.

In addition, the infrastructure surrounding the site is also aging and prone to damage by vibration.

***Scope Comments on Construction-Related Noise and Vibration:***

**The DEIS must include:**

- **An exhaustive analysis of noise impacts on the local community, considering the extreme proximity and probable timing of construction activities with an estimated duration of 6+ years**
- **An in-depth analysis of vibration impacts on adjacent structures and fragile, aging infrastructure such as water and sewer systems, as well as other underground utilities.**
- **A detailed analysis of vibration impacts on adjacent infrastructure: aging Catskill water mains and ancillary equipment, roadways (prone to buckling and sinkholes on State Street), sewer systems, and other underground utilities.**

**At a minimum, the developer must be required to:**

- **Develop a formal Vibration Monitoring and Control Plan.**
- **Perform precondition surveys at sensitive receptors, including adjacent residential structures with fragile, ornate interior plasterwork, to document existing conditions.**
- **Install vibration-monitoring devices along the residential thoroughfares to insure the safety and security of residents and the protection of their historic properties.**

*Construction-Related Air Quality* — The scope calls for a detailed qualitative assessment of construction-related air quality but not a quantitative one. Both are essential for a project of this magnitude.

***Scope Comments on Construction-Related Air Quality:***

There appears to be no plan to conduct a ***quantitative*** assessment of construction-related air quality. Only a detailed ***qualitative*** assessment is proposed. However, the CEQR Technical Manual calls for the consideration of a quantitative detailed analysis when: 1) the construction duration would be greater than two years, 2) the project would be located near sensitive receptors, and 3) the project would involve two phases with the construction of multiple buildings where receptors would exist on buildings already completed; 80 Flatbush meets these criteria. If it is assumed that project-specific control measures will be used to significantly mitigate impacts, this should be clearly stated.

*Emergency Provisions for Crane Failure or Collapse* — Recent experience with large-scale construction in New York City and the increasing prevalence of extraordinary weather events make the possibility of crane failure or collapse a distinct possibility in the construction of 80 Flatbush. Even the largest construction firms and developers in the City, such as Extell, have experienced such issues. The extreme proximity of this development to residences and businesses in the area makes this a most urgent concern.

Most importantly, Alloy Development has no recognized credentials or experience in the design or construction of high-rise buildings, especially those exceeding 900 feet in height. Their ability to deliver adequate emergency provisions for potential crane failure must be fully analyzed.

***Scope Comments on Emergency Provisions for Crane Failure or Collapse:***

**Task 17 must fully address the adequacy of emergency provisions for potential crane failure or collapse and the ability of the developer and local emergency services, such as Engine Company 226, to address this very real possibility.**

*Construction-Related Crime* — Over the past several years residents in north Boerum Hill, and particularly those living on State Street, have gained a first-hand knowledge of a critical problem impacting the construction industry: drug sales by and among construction laborers. On the 400 block of State Street, this reached a peak

during construction of The Hendrick, another private residential development, located several blocks away at 509 Pacific Street.

The issue is two-fold. First, workers on local construction projects set up operations on brownstone stoops with the intention of selling drugs. Many of these transactions are between construction workers. The second issue is drug use: State Street has become a haven for drug use by construction workers during their breaks.

Thus, the impact on the neighborhood is not only illicit activity and trespassing, but also the risks inherent in having drug-impaired laborers work on nearby construction projects. Associated Builders and Contractors has requested that City Council add the requirement for drug testing to construction safety legislation currently under consideration. Until such legislation is passed, the problem will remain.

***Scope Comments on Construction-Related Crime:***

**Task 17 must fully address the adequacy of the local police force to monitor construction labors engaged in illicit activity as well as the ability of the construction industry to self-police its workforce.**

*Constructability* — Alloy Development has *no* demonstrated credentials in the design, construction staging, QA/QC, or construction of super high-rise buildings. Had this project been procured under the public competitive bid process for either design or construction, this developer would never have met the minimum qualifications threshold. It is imperative to demonstrate that the team amassed by the developer offers the specialized experience necessary to perform this project.

***Scope Comments on Constructability:***

**Task 17 of the DEIS should provide an analysis of the ability of the development team to handle all aspects of this complicated and controversial endeavor.**

## **OTHER TECHNICAL AREAS**

*Safety and Security* — A discussion of safety and security is absent in the document.

The mission of the Khalil Gibran School is an important one, and supported strongly by the community. However, tolerance is not universal. Instances of domestic terrorism and violence toward Muslims and their institutions are escalating.

***Scope Comments on Safety and Security:***

**The DEIS must thoroughly address the issue of safety and security. This must include:**

- **Requirement for conduct of a Threat and Vulnerability Assessment.**
- **Requirement for conduct of a Safety and Security Risk Assessment.**
- **Provisions to blast-proof the buildings at the site and to prevent progressive collapse.**

*Elementary School Operations: Safety of Students* — The new elementary school will be sited in close proximity to the treacherous travel lanes of Flatbush Avenue. Accidents happen: children stray away from even watchful parents, teachers, school administrators, and care givers.

***Scope Comments on Safety and Security:***

**The DEIS must examine safety risks for young students relating to the high-speed travel lanes of Flatbush Avenue. This may include a study of the practicality of siting physical barriers to prevent students from accidentally straying into traffic.**

**Statement by Henry Carrier, Vice-President, Community Education Council, District 15, on the 80 Flatbush developments.**

**June 28, 2017**

My name is Henry Carrier. I am the Vice-President of Community Education Council, District 15. My comments today are my own and not necessarily those of the CEC.

The proposed project, 80 Flatbush, seeks a Zoning variance to construct up to 922 residential units, more than twice the number permitted under existing zoning regulations.

I believe this variance request should be rejected

The 80 Flatbush project will generate more students than the seats the developer, Alloy, is offering to build. This conclusion is based upon the very conservative, and inadequate DOE guideline for student population growth resulting from residential development.

Under the DOE formula, 55 students are projected for every 100 new residential units. The formula assumes, on average, that 45% of new residential units will not have any school age children as residents and the remaining units will only have one child. Most people would consider this formula to be very inadequate.

Nevertheless, if we use this formula, the 922 residential units at 80 Flatbush, will produce 507 new students.

Alloy is promising to build 700 seats of which 350 are a replacement of existing seats at the Khalil Gibran high

school. That leaves 350 new seats for a (in my opinion too small) new primary school.

So the 80 Flatbush project adds only 350 new seats to the District 15 capacity while adding 507 new students to the district. Even by the grossly underestimated DOE formula, the Alloy project falls short and will only exasperate the overcrowding issue.

It is also important to point out that the financing for the proposed 2 schools is coming from public funds and that the DOE/SCA can build a new High School to replace Khalil Gibbrand High School without the assistance of a developer. They could also purchase other parcels in the area to build the primary school. School construction does not require residential development that is out of proportion to the existing landscape of the community.

Allowing the FAR<sup>1</sup> (Floor Area Ratio) to climb almost 3 times to 18 from 6.5 is excessive particularly since the 80 Flatbush project is only adding to the overcrowding in District 15 and the DOE could build new and replacement schools without the assistance of this development.

I urge rejection of the variance request.

Henry Carrier  
VP, CEC 15  
718-913-4367  
henrycarrier@gmail.com

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<sup>1</sup> The floor area ratio (FAR) is the relationship between the total amount of usable floor area that a A higher ratio is more likely to indicate a dense or urban construction.

----- Forwarded message -----

From: Henry Carrier <[henrycarrier@gmail.com](mailto:henrycarrier@gmail.com)>

To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>

Cc:

Bcc:

Date: Wed, 26 Jul 2017 22:11:16 +0000

Subject: REVISED: Comments and questions concerning the 80 Flatbush project.

Hi,

Below please my revised comments on the 80 Flatbush ave project. I corrected the amount that the SCA has budgeted but not yet used for new school construction in District 15. It is \$138.68 million not \$15.99 million.

Please use this revision.

Thank you,  
Henry Carrier

My name is Henry Carrier. I am the former co-VP of Community Education Council, District 15. I did speak at the recent scoping meeting. For the record, I have attached my remarks form that meeting.

I am firmly against the proposed development. The project is not required to build schools and will not alleviate school overcrowding. The ECB and Alloy development have completely misrepresented the benefits of this project.

The basic premise of the developer's argument is that the proposed new schools will alleviate the student overcrowding in District 15. This argument is false and should be removed from all proposal documents. Based on the DOE's own formula for student growth due to the construction of new residential units, this project will generate more students than the number of seats provided. Note too that the DOE formula is widely seen as completely inadequate - 55 students for every 100 new residential units. The formula was developed by looking at development and census data trends from 1990 to 2000. It is very likely that all the new primary schools seats at 80 Flatbush project will be used by the residents of the development.

The NYC School Construction Authority, "SCA", which is different from financier of the 80 Flatbush project, the New York Educational Construction Fund "ECF", currently has a budget \$5.9 billion to build new school capacity in the city. In District 15, there are current 4 new capacity projects in the capital budget where sites have not yet been identified. Combined, there 4 projects have a combined budget of \$138.68 million and will provide for 2,249 new seats.

So we have a situation where the city has the budget to build 2,249 seats yet instead is turning to a state funding authority to build 700 seats (350 new/350 replacement) while providing tax free financing for a completely out-of-proportion development that will add to student overcrowding. Let's remember too, that the developer will be paid to build the 2 schools. This is quite a deal! It's like hiring a plumber to redo the pipes in your house in return for the rights to your back yard to build an Six Flags style amusement park which will finance the entire project. Of course, if the amusement park doesn't work out, you (i.e. the taxpayers of NY State) are on the hook.

The key to the financing is that the ECF as I understand it, owns the air rights above all public buildings and are chartered to work with developers to devise public/private projects. But we should all remember that these air rights are the public property and should not be ceded solely to line the pockets of private developers.

Not to be too cynical, but this all seems like a shell game. The SCA, which accesses the city's School Construction Capital budget, habitually comes to public meetings saying that they cannot find suitable sites for new schools and in turn, pushes budgeted capital funds forward into the next year. This way, while the budget shows funding, they never get around to fully spending it. The ECF is a way to avoid spending down the SCA budget.

Henry Carrier

Vice President, Community Education Council, District 15, 2015-2017  
PS 58 PTA President, '12-'14

[henrycarrier@gmail.com](mailto:henrycarrier@gmail.com)  
[718-913-4367](tel:718-913-4367)

From: Henry Carrier <henrycarrier@gmail.com>

To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>

Cc:

Bcc:

Date: Mon, 10 Jul 2017 21:14:03 +0000

Subject: Comments and questions concerning the 80 Flatbush project.

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Henry Carrier

Vice President, Community Education Council, District 15, 2015-2017

PS 58 PTA President, '12-'14

henrycarrier@gmail.com  
718-913-4367

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**From:** Daughtry Carstarphen <dcarstar@gmail.com>  
**Sent:** Sunday, July 09, 2017 4:22 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 Flatbush EIS Scoping Document

Dear Ms. Maldonado -

In order to fairly assess the impact of such a large and complex project, the EIS must include an increase the study area to one mile. Development at such an enormous scale has a ripple effect far beyond the 400 feet directly adjacent to the site. Obviously, this distance should be in all directions and should include in-depth study of the following questions (numbering follows the SEQRA Assessment categories shared at the scoping meeting):

1. How will the rezoning of this block maintain the "contextual development" that the limited height district on Schermerhorn Street maintains? How will it dovetail with the Atlantic Avenue Special sub-district?
2. Study the effects of this development on property values of adjacent low-height "brownstone Brooklyn" row houses. How will ten+ years of construction limit the market value of these homes?  
Analyze the total built SF since 2004 against the future need for commercial and market-rate retail.
3. How will the addition of cultural space assist Boerum Hill and Downtown Brooklyn residents on a daily basis? How does additional cultural programming dovetail with the existing BAM Cultural District and recent development therein?
4. How will the addition of almost 1000 new housing units affect the existing, limited green space in both Boerum Hill and Fort Greene?
5. Analyze sun, shadow, wind and building reflections of the proposed development on surrounding properties.
- 10/11. Analyze the impact of the additional sewage flow on existing sewers and treatment plants.

13. Analyze how the new development will strain the existing, over crowded NYC subway and bus system. What mitigations will be provided to ease this additional burden? Analyze vehicular and pedestrian traffic flows and capacities of existing sidewalks and roads beyond the 15 intersections proposed. Specifically focus on the Flatbush/ 4th/ Atlantic intersections.

Analyze the impact of citing school bus pick up and drop off on a residential street. How will this further exacerbate existing traffic back-ups on State Street? How will this impact the ability of Engine 226 to quickly exit down State Street and 3rd Avenue?

Analyze how the addition of two large loading docks on to a residential street will impact street level quality of life.

Note that per my meeting with DOT this Spring they admitted that there has been no thorough analysis of traffic in Downtown Brooklyn since 2004. Given the amount of development since the rezoning, this should be a required component of the EIS.

14. Analyze the impact on air quality for the EXISTING RESIDENTS. How will the project maintain clean air for all? How will the additional traffic generated by the development (recreational and service vehicles),

construction equipment, and required equipment such as generators NOT have an adverse impact on the general community?

16/17. Analyze the impact of construction noise on the mental health of residents. Note that E-Designations protect ONLY the people being housed in the development. What provisions will be made for existing residents to weather the new noise issues associated with a prolonged construction period and thousands of new residents within a single block? What specifically will be done to minimize the noise of HVAC and other mechanical and conveying equipment?

18. Determine the impact of the prolonged construction period on traffic flows, emergency response.

In addition:

A. Provide a market study of the additional retail square footage, particularly given the construction of thousands of square feet of prime retail space in the study area within the last 5 years.

B. Analyze the impact on street parking during construction and post-completion.

C. Study the impact of prolonged tax abatement on the construction of future schools. Without the addition to the city tax base, how will future schools be funded?

D. How will the proposed additional elementary school seats dovetail with the 500 new seats at PS32K and the open seats currently available at PS38? There are more public elementary schools in District 15 than PS58 and PS29.

E. How does the need for premium luxury office space compare with the need for permanent affordable housing?

F. How will the MIH ratio and distribution requirements be modified? What percentage of MIH units will actually be affordable (defined as 20% of AMI)?

G. Define exactly how the proposed development will meet the needs of existing workers, residents and visitors.

H. What exactly are the new employment opportunities that this development will bring? Will the positions be living wage?

Regards,

Daughtry

K. Carstarphen, AIA, NCARB  
546 State Street

David Chen  
1 Hanson Place, Apt 22H  
Brooklyn, NY 11243

July 28, 2017

Jennifer Maldonado  
Executive Director  
New York City Educational Construction Fund  
30-30 Thompson Avenue, 4<sup>th</sup> Floor  
Long Island City, New York 11101

Dear Ms. Maldonado,

I am writing to you today to voice my displeasure about the 80 Flatbush Avenue project. While I agree with the need to create more public schools to alleviate overcrowding and with ECF's decision to develop on 80 Flatbush, I vehemently disagree with Alloy LLC's plans for the site. Sitting in at 1,255,000 gsf, Alloy's proposed project is just too massive and would not fit well with the character of the surrounding neighborhood of Boerum Hill, Fort Greene, and Brooklyn Cultural District. Given the project size and Alloy's development experience I also have serious doubts that Alloy has the ability to deliver on their proposed project and therefore would ultimately jeopardize ECF's mission to create more public school space.

Alloy LLC is a very small design firm and their proposed project is overly ambitious to say the least. I don't know how ECF came to pick them but the facts about Alloy's work experience needs to be stated here. Alloy LLC has never designed a 74-story tower or even a 38-story tower that was eventually built. They have also never supervised a construction site that would encompass 61,399 square feet on the ground floor and 986 feet up in the air. Alloy has also never managed 922 residential rental units and I don't believe they have worked with the city on handling MIH units. They have also never managed 430,000 gsf of commercial/school/retail space as listed in the scope of work. What has Alloy worked on you ask? Perhaps it is near the realm of the proposed 80 Flatbush site and I'm not giving them fair representation. So here is a summary of Alloy's work experience as listed on their website [www.alloyllc.com](http://www.alloyllc.com).

One John Street – 130,000 sq. ft. – mixed use with 42 residential units  
Dumbo Townhouses – 15,000 sq. ft. – 5 residential units  
185 Plymouth Street – 30,000 sq. ft. – 10 residential units  
192 Water Street – 27,000 sq. ft – 9 residential units  
459 West 18<sup>th</sup> Street – 31,000 sq. ft. – mixed use with 10 residential units  
Glenmore Gardens – not listed – 9 residential houses.

All told, Alloy LLC has only developed around 260,000 sq. ft. through various projects over the entire history of the company. While I'm sure they have worked on other projects not listed on their website and their actual constructed square footage is higher than the number I have estimated, I am certain it is not by much more than that. Even if my figures are off and they have double the amount of design square footage experience at 520,000, it is still certainly not close to 1,255,000 gsf or even half that.

Interestingly enough, the only work listed on their website that comes close to the proposed 80 Flatbush is the never built project of 450 Hudson Boulevard. Here is Alloy's description of it... "Alloy assembled 39,518 square feet of land in the Hudson Yards District was afforded an as-of-right FAR of 24 or over 1,000,000 of leasable floor area." It goes on about the lot and concludes with this... "Alloy completed design and entitlement work to express the development potential and zoning freedom that the site affords and disposed of the site in 2013." So the only time Alloy came close to building a project the size of 80 Flatbush, they sold it under the rationale that it was just a facilitator to help others develop on it.

Alloy is simply too small of a design firm and the scope of work as described is too big for them to handle. Any one aspect of the project – the residential space, school/commercial space, overall project size – is already bigger than anything they have ever worked on COMBINED.

The 450 Hudson Boulevard project also conjures up fear that this developer will try to do the same thing with ECF – gather up the required paperwork and legal rights to build and then DISPOSE of the site to someone else for a quick profit.

There is too much risk involved in choosing Alloy. ECF is in the business of alleviating public school overcrowding and not in the business of giving inexperienced developers a chance to prove themselves. ECF needs sure-bets and work with experienced developers with a track record of accomplishments similar to what they proposed. What they don't want is a long and drawn out legal proceedings when the project has stalled or worse mismanaged and poorly constructed.

I would like to end my comment by reminding everyone of the history of real estate development in this part of Brooklyn for the last 10 years (2007 to 2017). As a unit owner at 1 Hanson Place since 2010, I am not sure I am legally allowed to discuss my experience with the real-estate developer of my building but I can tell you about other buildings nearby and what people had to go through. Most buildings that were developed along 4<sup>th</sup> avenue, Williamsburg and Fort Greene from early 2000 to now have had serious major defects. The defects are not cosmetic issues but serious deficiencies that if not fixed would potentially endanger the lives of the occupants or the pedestrians outside the building. Many of the owners in the buildings have had to sue the developer to since they were unwilling to work on it. In a majority of the cases, the developer

and the owner association settled out of court because neither wanted media attention. The developer didn't want a bad rap and the owners didn't want potential buyers to know about structural issues with the building. A lot of this was written up by the New York Times on March 6, 2015 in an article titled "New, but Far From Perfect. Construction Defects Follow a Brooklyn Building Boom." This is not to say issues like these can only happen to small developers. Forest City Ratner has had major issues when building the Barclay Center and B2 BKLYN (461 Dean Street). The only reason those projects were able to be finished despite their serious issues was because Ratner has deep pockets and the man-power to push the project through to completion. I doubt Alloy could have worked themselves out of those situations.

Listen, I'm commenting because I'm tired of seeing my neighbors suffer through dealing with poorly constructed buildings by developers who over promised. There's a repeated history of this type of behavior in this area. It's one thing to dupe luxury condo owners but it's totally another thing to trick the city and to deprive the children of a much needed school. The scope of work is too grand of a scale for both Alloy and ECF. I'm in favor of just converting the entire site to a school. Brooklyn Tech High School down the street seats 5,000 kids in one building. Why can't we just convert this block in the neighborhood into a school complex. ECF doesn't need Alloy's proposal. We should be getting Alloy to sell their share of the block and so DOE can finally build the schools they so much need.

Sincerely,

David Chen

Genevieve Christy - 445 Pacific Street - Brooklyn, NY11217 - genevieve.christy@gmail.com

The City of New York

Re: Proposed development of 80 Flatbush by Alloy

Scope of Work for an Environmental Impact Statement (EIS)

Meeting at Board of Education, 131 Livingston Street, Rooms 508A/B, Brooklyn, NY

June 28, 2017

To Whom it May Concern

I am a 31-year resident of Boerum Hill, former board member of the Boerum Hill Association, 20-year board member of Brooklyn Kindergarten Society. I am the CFO of the Center for Family Representation which provides legal and social work support for indigent parents at risk of losing their children to foster care. I care about my neighborhood and the most vulnerable residents of my city. I am very concerned about the current proposal for 80 Flatbush.

- The scope must include a study of all impacts within a half-mile radius. As we have seen with the development at the corner of Atlantic and Flatbush impacts are far reaching and long lasting. They begin but do not end with construction.
- The unprecedented FAR of 18 is simply too high and unsupported by either community needs or community benefits. A FAR of 12 is more appropriate. FAR 18 simply grants higher profit to the developer.
- The proposed tower is out of context even in consideration to new, ongoing and planned hi-rise construction in the neighborhood. It is an affront to the historic nature of Williamsburg Savings bank. A tower of this height should not be permitted to block the views of this popular and iconic landmark.
- School needs of existing residents must be met before thousands of new residents are added to the community. The proposal will absorb the current 300 Kahlil Gibran students and add another 300-400 slots which would likely be filled by new residents in the new construction. This does little, perhaps nothing, to solve the current, urgent school need and the proposal should not be marketed as such.
- The scope of the EIS should include impacts within a half-mile radius on all surface transit including cars, commercial trucks, bikes and pedestrians as well as subways and rail and must include impacts of all ongoing and planned construction.
- The scope should include impact of shadows, reflections and wind of the new towers.
- The scope should include construction impacts from vibration of heavy commercial vehicles on vulnerable 19<sup>th</sup> brownstones in a half-mile radius.
- The scope should include sewage impacts of adding the thousands of new residents and workers in an already overloaded sewage system as well as impacts on air quality.
- The scope should include impacts of construction noise on the students in the Kahlil Gibran School which will be operating throughout the construction period in both its existing and new location.
- The scope should include a true assessment of community needs and priorities. The BAM area is already saturated with cultural venues. The nearby Brooklyn Museum for visual arts is underutilized. Commercial art galleries throughout New York City are closing. The scope should include assessment of the utilization of current venues.

- The scope should include an assessment of the safety of students during construction and finally in the new schools in the midst of a heavy traffic zone.
- The scope should assess capacity of all existing city infrastructure to support needs of new residents and workers including but not limited to hospitals and police.

Too often high impact development is marketed as primarily about community needs and benefits which are rarely, if ever, delivered to the extent in the approved plans. I would very much like to see a report on delivery of promised benefits of jobs and affordable housing of the Barclays Center development. The residents of Brooklyn can only hope that our elected officials will genuinely assess our needs and benefits and require that the existing proposal by Alloy Development be substantially altered and scaled down.

I understand and support the rationale for high density development. The development we see often does not go where it might most benefit a community but where it degrades an existing, already vibrant community that a developer seeks to profit from. The current popularity of Brooklyn is generated by its distinction from and contrast to the urban, impersonal nature of Manhattan. The development of the Atlantic Yards and completed, ongoing and planned developments along Flatbush and downtown Brooklyn and now 80 Flatbush threaten the very nature that makes our borough so celebrated.

Sincerely,



Genevieve Christy

Cc: Steve Levin, Brad Lander, Eric Adams, Community Board 2

5 JUL 2017

June 29, 2017

Jennifer Maldonado, Executive Director  
New York City Educational Construction Fund  
30-30 Thompson Avenue 4<sup>th</sup> Floor  
Long Island City, NY 11101

Re: Proposed development of 80 Flatbush by Alloy  
Scope of Work for an Environmental Impact Statement (EIS)

I am a 31-year resident of Boerum Hill, former board member of the Boerum Hill Association, 20-year board member of Brooklyn Kindergarten Society. I work for a non-profit that provides legal and social work support for indigent parents at risk of losing their children to foster care. I care about my neighborhood and the most vulnerable residents of my city. I am very concerned about the current Alloy proposal for 80 Flatbush.

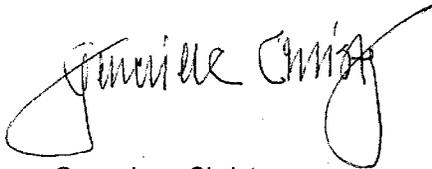
- The scope must include a study of all impacts within a half-mile radius. As we have seen with the development at the corner of Atlantic and Flatbush impacts are far reaching and long lasting. They begin but do not end with construction.
- The request for a zoning variance for an increase to FAR 18 should be denied. The unprecedented FAR of 18 is too high and unsupported by either community needs or community benefits. FAR 18 simply grants higher profit to the developer.
- School needs of existing residents must be met before thousands of new residents are added to the community. The Alloy proposal will build new facilities to absorb the current 300 Khalil Gibran students and add another 400 slots which would likely be filled by new residents in the new construction. In fact a recent disclosure estimates that the 900 new Alloy apartments would add a minimum of 500 more students to the neighborhood thus increasing school overcrowding and increasing the need for yet more new slots. To my mind it is just false to market this proposed development as one that ameliorates the need for additional schools. Everyone I have met supports the badly needed upgrade for the Khalil Gibran School. It is up to the ECF and our elected officials to provide appropriate facilities without asking for an unprecedented tower complex in return.
- The proposed 920 foot-tall tower is out of context even in consideration of new, ongoing and planned high-rise construction in the neighborhood. It is an affront to the historic nature of 512-foot tall Williamsburg Savings bank. A tower of this height should not be permitted to block the views of this popular and iconic landmark.
- The scope of the EIS should include impacts within a half-mile radius on all surface transit including cars, commercial trucks, bikes and pedestrians as well as subways and rail and must include impacts of all ongoing and planned construction.
- The scope should include impact of shadows, glare/reflections and wind of the new towers. Glare from new tower blocks is becoming an increasing nuisance throughout New York City.
- The scope should include construction impacts from vibration of heavy commercial vehicles on vulnerable 19<sup>th</sup> brownstones in a half-mile radius.

- The scope should include sewage impacts of adding the thousands of new residents and office workers in an already overloaded sewage system.
- The scope should include impacts on air quality that have been a concern for many years.
- The scope should include impacts of construction noise on the students in the Kahlil Gibran School which will be operating throughout the construction period in both its existing and new location.
- The scope should include a true assessment of community needs and priorities. The BAM area is already filled with cultural venues. The nearby Brooklyn Museum for visual arts is under-utilized. Commercial art galleries throughout New York City are closing. In evaluating a new need, the scope should include an assessment of the utilization of current and planned venues.
- The scope should include an assessment of the safety of students during construction and finally in the new schools in the midst of a heavy traffic zone.
- The scope should assess capacity of all existing city infrastructure to support needs of new residents and workers including but not limited to hospitals, fire stations and police.
- The scope should include full disclosure of the developers cost, profit and all city and state tax abatements.

Too often high impact development is marketed as primarily about community needs and benefits which are rarely, if ever, delivered to the extent in the approved plans. I would very much like to see a report on delivery of promised benefits of jobs and affordable housing of the Barclays Center development. The residents of Brooklyn can only hope that our current elected officials will genuinely assess our needs and benefits and require that the existing proposal by Alloy Development be substantially altered and scaled down.

I understand and support the rationale for high density development. The development we see too often does not go where it might most benefit a community but where it degrades an existing, already vibrant community that a developer seeks to profit from. The current popularity of Brooklyn is generated by its distinction from and contrast to the more urban, impersonal nature of much of Manhattan. The development of the Atlantic Yards, the completed, ongoing and planned developments along Flatbush and downtown Brooklyn and now 80 Flatbush threaten the very nature that makes our borough so celebrated.

Sincerely,

A handwritten signature in black ink, appearing to read "Genevieve Christy". The signature is fluid and cursive, with a large loop at the end of the last name.

Genevieve Christy

Cc: Steve Levin, Brad Lander, Eric Adams, Community Board 2

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**From:** Mike Coelho <michaelcoelho@gmail.com>  
**Sent:** Monday, July 10, 2017 1:54 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 Flatbush Avenue

Hello,

I live on 556 State Street and, like many other residents of the area, am extremely concerned about the development project for 80 Flatbush Avenue.

For starters, does the area really need so many rental units? It seems that the neighborhood has already been flooded with too many apartments and many buildings are not fully occupied. We are worried that construction may not be completed for many years if the market takes a bad turn. Then we will be faced with a vacant lot for many years to come.

State Street is already very congested and in no way can handle such a development in its current condition. There is a very active fire station on the street. Have you considered what the effect would be on their response time once this construction begins? The intersection of Flatbush and State would have to be completely re-evaluated. A traffic light would absolutely have to be installed there to ensure safety.

There is no doubt that this block could be put to better use. A brand new school, retail offices and apartments is definitely a good idea. I am not against progress at all. I have benefited from the market by seeing my property value increase significantly and understand that I may be inconvenienced in the short time by construction. But this proposal far exceeds what is viable for that particular space. I implore you to please reconsider this proposal and to downside it accordingly.

Thank you for your time.

Michael Coelho

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----- Forwarded message -----

From: Nancy Cogen <[nancycogen@yahoo.com](mailto:nancycogen@yahoo.com)>

To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>

Cc:

Bcc:

Date: Tue, 25 Jul 2017 03:04:00 +0000

Subject: 80 Flatbush

I oppose the takeover of our neighborhood (Boerum Hill) by yet another mega project. In reality there is not the need for another large development. Many apartments in the new buildings are not rented.

There are many problems with the proposal for 80 Flatbush:

1. There needs to be a study are of 1/2 mile--not the proposed 400'
2. Yes, there may be a need for an upgrade on Khalil Gibran, but this is not the way. You are using this and the other included schools as a pawn to push the development.
3. I'm thinking about what this would do to the neighborhood in terms of water, air, sewer, wind, traffic, shadows, congestion, transit (which is already overwhelmed), deliveries, pedestrian safety, etc. I'm sure my list could go on.

It is not that I think this project should go back to the drawing board, I think it should be scrapped.

Sincerely, Nancy Cogen

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**From:** Charles Cohen <charlescohen3@gmail.com>  
**Sent:** Monday, July 10, 2017 1:14 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 Flatbush

**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](mailto:KhalilGibran80Flatbush@schools.nyc.gov)

Dear Ms. Maldonado,

I am a resident of Fort Greene and have seen the area go through tremendous change. However, I find the proposed project at 80 Flatbush is requesting several waivers that require very careful study. The approval of said waivers would, I believe, adversely impact the surrounding area and are unnecessary for the positive and financially successful development of this parcel.

Items that should be studied as part of the EIS include:

- Expansion of the study area from the 400 feet in the proposal to one half mile to better reflect the historic neighborhood and change that has taken place recently. This will also take into consideration the impact of the development on traffic, noise, water and sewer load, air quality, transit, parking, pedestrian safety and other quality of life issues.
- Inclusion of a review by the Landmarks Preservation Commission with respect to designated landmarks including The Williamsburg Savings Bank Building and the historic Fort Greene neighborhood.
- Clear justification for the waiver of height and setback regulations especially for the 38-story phase 1 tower, which is "flatiron" like in shape. The precedent of the Flatiron Building is completely inappropriate for this development parcel. That building was built prior to zoning regulations. Height and setback regulations preserving access to daylight and sky are crucial and should not be dismissed lightly. I see no reason why this project merits such a waiver.
- Economic justification for the need for such a radical increase in FAR. This increase is unsupported by the relative scale and density of the surroundings. A 90-story building such as this would be more appropriate only in the densest parts of Manhattan and even then would be rare. There is no existing infrastructure to support such an increase nor is there precedent in the surroundings for anything even remotely approaching this level of development.

While the rebuilding of a school and the addition of a new school are certainly needed, to my view these benefits do not sufficiently justify the waiving of zoning regulations that were carefully designed and considered only relatively recently.

In addition a study is needed to determine how many school age children will result from 900 housing units and how the city will address even the current seating deficit.

In closing, I feel that this development needs to be tailored to provide an economically viable benefit to the neighborhood.

Thank you,

Charles Cohen

One Hanson Place #16BC

Brooklyn, NY 11243

[charlescohen3@gmail.com](mailto:charlescohen3@gmail.com)

(347) 852-4531

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**From:** Elizabeth Contes <elizabeth.contes@gmail.com>  
**Sent:** Friday, July 28, 2017 11:50 AM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 FLATBUSH AVE-STOP DO NOT CONSTRUCT

To: Educational Construction Fund

THIS IS OUTRAGEOUS!! The proposal of such an enormous building is unfathomable and greed to the highest level.

My mom and I have been in Fort Greene, Brooklyn, the heart of where this building is proposed to be built, for over 50 years and we have seen many drastic changes to our historic, residential quaint neighborhood. **THESE BUILDINGS ARE RUINING THE BEAUTY AND HISTORY OF OUR NEIGHBORHOOD AND WHAT OUR COUNTRY STANDS FOR!!** There is no more land to build new buildings so developers have been allowed to build upward. How is this justified. Building taller buildings where there were brownstone or small tenaments. These tall buildings increase the number of people but where are the accommodations once they leave these skyscrapers. **THERE ARE ENOUGH PEOPLE NOW! THERE IS MORE TRAFFIC, LESS PARKING, LESS STORES TO BUY GROCERIES.** People came to this neighborhood to have families. This is destroying family life because those that come into the neighborhood stay for a short period of time and leave. No foundation, no family building just career advancing and making money. **IT'S SO SAD AND DISGUSTING! What happened to the community, OUR COMMUNITY! THERE IS NO COMMUNITY JUST A LOT OF PEOPLE COMING AND GOING!! THIS IS MONEY HUNGRY GREED!!**

**WE ARE AGAINST THIS PROPOSAL AND ANY OTHER FOR TALL BUILDINGS!!!**

**ENOUGH IS ENOUGH!!!!!!!!!!!!!! DO NOT CONSTRUCT OR APPROVE THIS PROPOSAL!!!**

SINCERELY,

Elizabeth and Gertrudis Contes  
Long time residents of Fort Greene

----- Forwarded message -----

From: Noah Cooper <noah.p.cooper@gmail.com>

To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>

Cc:

Bcc:

Date: Thu, 6 Jul 2017 02:56:45 +0000

Subject: Schools Yes / Sky Scrapers No

We need schools not sky scrapers. Why are we ruining our beautiful historic skyline with a monstrosity of a skyscraper? I would love to hear why there is a need for a sky scraper with the construction of a school? Let's spend more resources on building the best school in Brooklyn and less resources on another 300 Ashland...

Noah

Fort Green Resident

----- Forwarded message -----

From: "Corell, Paul" <pcorell@hopsteiner.com>

To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>

Cc: "Howard Kolins (hkolins@aol.com)" <hkolins@aol.com>

Bcc:

Date: Fri, 28 Jul 2017 22:37:12 +0000

Subject: RE: Proposal to build multi-story building at 80 Flatbush Av. (by Alloy)

Dear Ms. Maldonado,

I am an immediate neighbor to the 80 Flatbush site and I'm writing to tell you that, yes, I agree with the folks at Khalil Gibran High School that they and we all need an improved physical plant for the students at their school, but not at the expense of the surrounding community.

The plan put forward by Alloy, as I understand it, can be "expanded" by them to include additional seats for schoolchildren in the same building site, probably involving an add-on elementary school to the premises. But would that be of benefit, considering that Alloy's plan is to increase population density in our neighborhood by increasing the height of its building project and thereby taking up some if not most of the classroom seats to be added?

Other considerations: looking at the burgeoning no. of such building projects going on within a mile radius and evaluating whether we actually need such a behemoth on the very next block from where I live, and sufficient infrastructure (i.e. mass transit capacity, parking facilities, sanitation pick-ups, rat abatement, etc.) also need to be addressed.

And furthermore, I think that the old "Board of Ed" buildings which currently occupy a significant amount of the ground space at 80 Flatbush are far more elegant and appealing to the eye, than what Alloy has proposed.

So I have grave misgivings that this kind of complex can be successfully and sanely built on the proposed site, so maybe this idea will not go through and will not be built. Let's let the community have a say in the implementation of such a harmful and needless plan.

Sincerely,

Paul Corell

476 State St. (where I live on the catty-corner block to the proposed building site)

Brooklyn, NY 11217

(212) 515-7225

From: Sarah Crichton <skcrichton@aol.com>  
To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>  
Cc:  
Bcc:  
Date: Tue, 25 Jul 2017 19:51:37 +0000  
Subject: 80 Flatbush EIS Scoping

To Jennifer Maldonado, Executive Director  
New York City Educational Construction Fund  
30-30 Thomson Avenue, Fourth Floor  
Long Island City, NY 11101

Dear Ms. Maldonado:

I have been a home owner in Boerum Hill since 1985. I raised my family here. My brother had a home here, and had children here as well. This is a small but vibrant and diverse community that is perilously close to being not only overwhelmed but actually destroyed by massive development that is not only on its boundaries, but is creeping into, and thereby shrinking, our community.

Our streets are being cast in shadows. The green spaces, where we let our children play, and teach them the importance of nature, are disappearing. These development plans do not include open space for the community. The scale is out of whack. The density is excessive.

I believe in development for affordable housing and like other in this community, I welcome the schools. But they must not be allowed to violate the zoning we have. They must not be allowed to shred the fabric of a small but vital neighborhood such as ours.

The study of 400-feet is inadequate to study all the indirect impacts. If you do not live in this area, it is hard for you to see them. But if you live in the area, there are many, and they are powerful and intrusive and damaging to our psyches, our land values, our quality of life, the community we have worked so hard to bring back from the crack years, when the area was dangerous, and damaged, and full of mistrust.

Don't let immediate needs shortchange long-term goals.

Thank you,

Sarah Crichton and Eliza Martin  
201 Bergen Street  
Brooklyn, NY 11217

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**From:** Rutul Dave <rutuldave@gmail.com>  
**Sent:** Friday, July 28, 2017 3:26 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** Concerns regarding 80 Flatbush Scoping

To:  
Jennifer Maldonado, Executive Director  
New York City Educational Construction Fund  
30-30 Thomson Avenue, Fourth Floor  
Long Island City, NY 11101

Dear Ms. Maldonado,

As a resident of Boerum Hill, I am writing to express my concerns regarding the 80 Flatbush Scoping. The main concerns I have against approving this project are:

- This development is located in Boerum Hill not downtown therefore the density is excessive.
- Locating the tallest tower in Brooklyn next to low-rise residential buildings is a violation of transitional zoning and design context.
- The study area of 400-feet is inadequate to study all the indirect impacts, therefore a half-mile radius is needed.
- The development does not include any open space for the community. While green space is shown on the roofs of the schools, they are small and may not be accessible to the public.

Regards,  
Rutul Davé

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**From:** Martha Denton <martha@marthadenton.com>  
**Sent:** Thursday, July 27, 2017 5:45 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 Flatbush

I'm all for new schools, but I'm against putting Brooklyn in the shadows of skyscrapers. Please find another solution.

----- Forwarded message -----

From: Michael DuBick <dubick105@gmail.com>

To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>

Cc:

Bcc:

Date: Fri, 7 Jul 2017 16:46:40 +0000

Subject: Comments on the draft scope of work for EIS-ECF 80 Flatbush Avenue

Dear Ms. Maldonado,

My comments regarding the ECF 80 Flatbush Avenue Draft Scope of Work for an Environmental Impact Statement are attached. Thank you for the opportunity to review and comment on this project.

Michael A. DuBick  
105 Wyckoff Street  
Brooklyn, NY 11201  
dubick105@gmail.com

ECF 80 FLATBUSH AVENUE  
Draft Scope of Work for an Environmental Impact Statement

COMMENTS

NAME: Michael A. DuBick  
ADDRESS: 105 Wyckoff Street, Brooklyn, NY 11201  
E-MAIL: dubick105@gmail.com

I am Michael A. DuBick, a homeowner and 37 year resident of Boerum Hill, a community adjacent to and partially encompassing the real estate development site of the 80 Flatbush project. During those nearly four decades, I have witnessed many changes within and surrounding the neighborhood, some of them positive, others negative for the area and its residents, with the project under consideration, 80 Flatbush, having negative effects. I say this for several reasons; they are:

1. The school system. Although the plan under review would provide much needed benefits to the Khalil Gibran High School, it exacerbates an already significant problem plaguing elementary and middle schools in School District 15 which, according to available statistics, has a total need of 2192 classroom seats with fully 912 unfunded at this time. The proposal to build classroom space to accommodate 350 or so students, while appearing to mitigate the problem, will in fact only make it worse, because the large residential towers, comprising 900 units, would conservatively add 495 school age children to the district according to New York City Planning Commission guidelines. Simple arithmetic shows a negative impact on classroom space arising from the 80 Flatbush project.

2. Water and Sewer Infrastructure. There has been a sudden growth of large residential construction in the immediate vicinity of the proposed project and even more is coming in the near future. The vicinity of 80 Flatbush has, perhaps, some of the oldest water and sewer lines in the city. My own block in Boerum Hill, Wyckoff Street, between Smith and Hoyt streets, had its main sewer line replaced 18 months ago because the previous plumbing was verging on collapse. How intact are the system components at the proposed site and its surrounding area? Can it withstand the stress of 900 additional apartments plus large scale commercial development as proposed by the 80 Flatbush project? These are, I believe, unanswered questions.

3. Transportation. The location of 80 Flatbush would appear to be ideally suited to take advantage of mass transit hub nearby, serviced by several subway lines plus the Long Island Railroad Station. Those stations are already growing more crowded and will continue to be so with the nearby Atlantic Yards development plus several multistory apartment buildings in proximity to 80 Flatbush. In addition, with the proposed commercial development incorporated in the project, which proposes a loading dock on State Street, vehicular traffic is likely to worsen. The number of families that would inhabit the proposed project will, no doubt, add to the problems of traffic, parking and congestion on narrow one way streets. During the construction phase, which would likely extend to 2025 and beyond, the ability

for emergency vehicles, particularly coming from the fire station on State Street, to respond efficiently would be compromised as well.

4. Integrity of the architectural character. Neighborhoods surrounding 80 Flatbush such as Boerum Hill and Fort Greene are characterized primarily by 3 and 4 story residences, many built in the late 19<sup>th</sup> and early 20<sup>th</sup> centuries, hence the designation: “Brownstone Brooklyn”. Although recent construction in nearby “Downtown Brooklyn” has included several high rise (20 to 30 story) apartment towers, particularly along Schmerhorn Street, Ashland Place and Flatbush Avenue, the area is still fundamentally comprised of smaller scale buildings. Much of Boerum Hill, for example, is zoned as R6B, with its attendant height and floor area ratio (FAR) restrictions. The site for the 80 Flatbush project currently has an FAR of 6.5. The proposed project requests a change of that ratio to an FAR of 18, just shy of a 277 per cent increase. Granting such a gross change belies the concept of zoning to the point where zoning maps seem to exist only for the purpose of petitioning for an exception, waiving the zoning restrictions for a given site. One can reasonably raise the question: why bother to have zoning in the first place. Thus, allowing a FAR 18 project to go forward is building a bridge too far.

For these reasons, I oppose the project known as 80 Flatbush.

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From: mary beth early [mailto:[marybethearly@me.com](mailto:marybethearly@me.com)]  
Sent: Thursday, June 22, 2017 10:41 AM  
To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>  
Cc: Howard Kolins <[hkolins@aol.com](mailto:hkolins@aol.com)>; Daniel Abramson <[dabramson@cityhall.nyc.gov](mailto:dabramson@cityhall.nyc.gov)>  
Subject: Alloy Development Proposal

Dear Alloy Development Proposers,

I am writing to express my opposition to the proposal, or to any proposal by the applicants that seeks a change in FAR permitting construction in excess of 10 stories. Here are my several reasons:

1. This is a low rise historic neighborhood consisting primarily of homes built before or shortly after the Civil War. Several such homes are on State Street directly across from the proposed project. Others are on the next block (Third/Nevins). The preservation of the neighborhood requires maintaining existing light and air and views of the sky. This is the most critical point, and is a stand-alone reason! Pedestrians come to the neighborhood to stroll along the historic facades and enjoy a glimpse of Brooklyn's past, when Walt Whitman perhaps walked these very streets.

2. Adjacent development gives one a sense of how the proposed project would feel to the residents on State Street and other areas of Boerum Hill. The building at 333 Schermerhorn is too high, but it is a done deal. It casts a shadow and blocks the morning winter sun on Pacific Street where I live, which is four blocks to the southwest and between Bond and Nevins. Page 13 of the proposal appears to assume that pedestrians never look up, and that a massive tower would not affect the pedestrian experience.

3. Unmentioned by the proposal authors is the issue of glare. On Pacific Street we need to close our shutters at certain times of year to "mitigate" the blinding flashes of intense light bouncing off of 333 Schermerhorn. Cast shadow is a problem, but also glare. This would have to be addressed for any building that would rise higher than the present streetscape (yes, even 10 stories).

4. The proposal authors present their project as a gift to the area, bestowing on us so much that we don't already have. Not a gift in our view. Yes, the Kahlil Gibran HS site is ridiculously labyrinthine and another site should be found for the school. One can imagine other solutions. The proposal sells the project as though it were the only way to address this need.

5. Do we need more retail? Look around at the multitude of vacant retail sites in the neighborhood and see if you can make a case. Look around at the small luxury shops that offer nothing essential to residents.

6. Do we need another art space? Again, look around. How can this be needed when there is already so much?

7. Comprehensive neighborhood development, as touted on page 4 of your proposal, would address basic services such as laundromats, bodegas, small (non-luxury grocery) stores.

8. Affordable housing is needed, yes. But, it is illogical to place such housing where basic services such as above in #7 are not available, and where one must travel a mile, to another zip code, to retrieve a USPS package.

9. Task 4 addresses Community Facilities and Services, and completely ignores the recent history of overall new development already placing a cumulative burden. The proposal authors seem to view the proposed project outside of this context as the proposal states repeatedly states that detailed analysis is not needed. Water, sewer, police, fire, gas and electric services, subway experience, all would need to be examined. The proposal argues that if adverse impacts are identified, measures can be identified to "mitigate" them. What about not creating the impact in the first place?

The proposal considers only two scenarios: the project vs the No Action condition. This seems unimaginative at best. We in Boerum Hill would like to see other scenarios that can preserve our neighborhood while also addressing the needs of the school.

I look forward to a new proposal that downsizes the project and that considers the Boerum Hill context and the needs of Boerum Hill residents.

Mary Beth Early

426 Pacific Street

Brooklyn 11217

---

From: mary beth early [mailto:[marybethearly@me.com](mailto:marybethearly@me.com)]

Sent: Sunday, July 02, 2017 12:17 PM

To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>

Subject: District 15 concerns about the project

Dear Alloy Development Proposers,

After attending the scoping meeting and considering what was presented about new seats in District 15, and the building of a new facility for Khalil Gibran High School, I have more questions and comments:

1. Why does the proposal highlight the shortage of seats in PS 29 and PS 58, while other schools in the District have seats available? PS 38 is an example.
2. How will children residing in the proposed project be zoned for elementary schools?
3. How will the seats in the new elementary school be allocated, so as to address the current shortage of seats as well as the needs of residents in the towers?
4. What other plans does DOE have to address the current shortage of available seats? What is their plan going forward as this project and other new residential buildings bring more school-age children into District 15?
5. How will the KGHS retain its identity and mission to serve the immigrant population? What will happen when non-immigrant applicants apply as first choice for seats in the new modern high school? Who will be given preference and how will this be justified?
6. High school principals are under pressure to produce results under a variety of "metrics" focused on academic achievement, graduation rates, college acceptance, etc. Even if the current principal stands firm, he cannot legitimately favor applicants by country of origin. How can KGHS prevent the situation that has happened all over Manhattan, in which the cohort of each successive class has become more aspirational, more white, more privileged?
7. NYC DOE this month released a diversity plan, which has been criticized as timid, weak, and limited, for failing to adequately address racial and socioeconomic segregation. How would the proposed elementary school meet or exceed diversity goals?

Mary Beth Early  
426 Pacific Street  
Brooklyn 11217

From: mary beth early <marybethearly@me.com>  
To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>  
Cc: Howard Kolins <hkolins@aol.com>  
Bcc:  
Date: Tue, 25 Jul 2017 18:57:18 +0000  
Subject: 80 Flatbush comments and questions  
Dear Alloy Development Proposers,  
Having reviewed your proposal again, I have the following new comments and questions:

1. Regarding shadows, why is the review limited to four days per year? It seems to me you must have the technical capability to run a computer simulation for all times of day throughout the year, so as to provide a more comprehensive guide to the impact of shadows from the proposed oversize towers. When the sun is low in the sky the distance would be far greater than the meager 400 feet study area proposed, affecting trees and plants on private property and community gardens.
2. I would ask for the same information about reflections. Assume the sun can be shining at any moment during daylight hours, year round. Given the faceted surfaces of the proposed towers, where would the light be reflected, and which buildings or natural resources would be affected by glare? How far away? Would it affect riders of the F and G trains where the tracks are elevated from the Carroll Street stop to 4th Avenue?
3. Regarding CSO or combined sewer overflows, it is essential to extend the study area at least to the Carroll Street Bridge, and perhaps all the way to the mouth of the Gowanus Canal. Each time it rains any amount, the Gowanus Canal is put on advisory for sewer overflow for at least 24 hours after the rain stops, and sometimes longer. The addition of 900 additional housing units and their water use for toilets, showers, laundry, dish washing, etc. will increase the outflow to the system and thus occasion more frequent and longer advisory periods. When there is storm surge from the southeast, as in Superstorm Sandy, the flooding and sewer overflow is even greater.
4. I am outraged that such a project is under consideration, with a request for change in zoning to allow for extreme high-rise towers immediately across the street from three story houses in the low-rise historic district of Boerum Hill.
5. Further, it is questionable whether any additional housing is needed, given the 7500 new units to come online in Fort Greene and the glut of rental housing in the adjacent neighborhoods as reported in The Real Deal. <https://therealdeal.com/2016/08/30/will-fort-greenes-glut-of-rentals-put-an-end-to-rising-prices/>
6. It would be helpful to see renderings of building height and use under the “no action” plan, since the “benefits” from the zoning variance seem alleged and not real. I favor NO ACTION.

Mary Beth Early  
426 Pacific Street

Brooklyn 11217

From: JP ES <jpegui@gmail.com>  
To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>  
Cc: Alex Miller <alexdmiller88@gmail.com>  
Bcc:  
Date: Tue, 25 Jul 2017 18:22:28 +0000  
Subject: Feedback re: 80 Flatbush  
Good afternoon,

Please read below for our comments regarding 80 Flatbush proposed project.

My wife and I recently became homeowners at One Hanson Place. We were married last fall and moved to Fort Green in hopes of starting a family. We moved into the neighborhood earlier this year, aspiring to settle into a neighborhood that would offer an established sense of community, greener areas, cultural diversity and an escape from Manhattan's inefficient city planning.

We are disappointed and frustrated to realize that a grotesque proposal such as 80 Flatbush is even being considered in Boreum Hill. This massive twin-tower structure threatens to distort the aesthetics of the neighborhood and the flow of traffic; welcomes higher noise pollution, a decrease in air quality and an increase in sewer loads; and more importantly, sets a dangerous precedent to the neighborhood and its vicinity.

The density of this project is excessive for its location. Its height is also outside traditional neighborhood parameters, violating design context and transitional zoning. It is difficult to comprehend how the developer intends to measure direct and indirect impacts of such a massive project with a mere 400-foot study area.

The implications to vehicular traffic, foot traffic, and public transportation are difficult to quantify, but one could only imagine that in an already congested block, a proposal of this size will create a strenuous bottleneck for all who live and transit through the area.

I hope that these statements and rhetorical inquiries contribute to halting the momentum for this project and encourages the authorities to reevaluate obvious risks and consequences.

Tank you for your consideration.

Kind regards,

Juan P. Egui & Alexandra Miller  
Residents of One Hanson Place

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From: Kris n Eliasberg [mailto:[kris\\_n1230@yahoo.com](mailto:kris_n1230@yahoo.com)]  
Sent: Thursday, July 27, 2017 1:56 PM  
To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>  
Subject: 80 Flatbush EIS Scoping

Jennifer Maldonado, Executive Director  
New York City Educational Construction Fund  
30-30 Thomson Avenue, Fourth Floor  
Long Island City, NY 11101

Dear Jennifer

I am writing with regard to the proposed development at 80 Flatbush in Boerum Hill.

Because this development is located in Boerum Hill and not in downtown Brooklyn, the proposed density is excessive. To locate the tallest tower in Brooklyn next to low-rise residential buildings is a violation of transitional zoning and all design context. With regard to scoping, the study area of 400-feet is inadequate to encompass all the indirect impacts. A radius of at least a half-mile to a mile is needed.

For a more accurate and informed study, the EIS should include drawings and elevations of the No Action plan as well as a comparison elevation of the heights of all buildings over 12-stories in the study area.

The size and density of the development must be scaled down in order not to overwhelm the rest of the neighborhood. In addition, as far as I can tell, the development does not include any open space for the community. While green space is shown on the roofs of the schools, they are quite small and would not be easily accessible, or perhaps not accessible at all, to the public.

The existing community is outraged about this overly large twin-towered proposal. We welcome the schools and the affordable housing but not if it ruins our neighborhood.

Thank you for your time and attention,

Yours,  
Kristin Eliasberg

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**From:** Kristin Eliasberg <kristin1230@yahoo.com>  
**Sent:** Monday, July 10, 2017 2:31 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** Scoping for 80 Flatbush

Dear Jennifer Maldonado,

I am writing in regard to the proposed development at 80 Flatbush. I would like to request that the study area to be expanded to one mile due to all the other residential construction recently completed or under construction now in that same area. I would like to request that all metrics encompass the additional population expected, which will be substantial given how many new high rises are within 1 mile of the proposed construction.

With regard to the school system, I would also like to know whether this proposal will yield a net increase or decrease in the number of school seats currently needed -- either funded or unfunded? I have a middle school age daughter and a scarcity of seats is a major concern for me. What plan does DOE have to address the seating deficit? And on what timetable?

I am also very concerned about what effect this development might have on already-strained transportation options in the area. Has a study been made of the impact on the current capacity at the Hoyt-Schermerhorn and the Hoyt Street subway stations? Particularly during rush hour when those stations are already used to the maximum?

As someone who moved to Brooklyn to escape the crowding of high rises in Manhattan neighborhoods, I am very concerned about the size and height of the proposed development. Is there any 50+ stories tower within 60 feet of a 4-story brownstone anywhere else in Brooklyn or would this be the first? Preserving the character of Brownstone Brooklyn is important not only to its residents but for the city as a whole, even if only for purposes of maintaining the economic boon that tourism brings us every year. I would like to know how this proposal respects "transitional zoning," and I request that the building's criteria for design have a reference to brownstone Brooklyn.

Many thanks for your time and attention to this matter,

Yours,  
Kristin

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**From:** Andrea Esposito <andyxpo@gmail.com>  
**Sent:** Friday, July 07, 2017 2:41 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 Flatbush - EIS Questions & Comments  
**Attachments:** 80 Flatbush - EIS Questions\_Comments.docx

Ms. Jennifer Maldonado, Executive Director  
New York City Educational Construction Fund  
30-30 Thomson Avenue, Fourth Floor  
Long Island, NY 11101

RE: 80 Flatbush Avenue Draft Environmental Impact Statement Scope of Work

Ms. Maldonado,

We have lived in the neighborhood for over 30 years and have continually seen the deterioration in the community's infrastructure, available school facilities and severe overcrowding of transportation choices among other issues. Below is a concise listing of our questions (and a copy of this letter attached).

Having reviewed the draft EIS and listened to Alloy's CEO pitch, the EIS has to confirm the school seat benefit of this proposed ECF project. Additionally the scope needs to be broadened. In my view, the EIS needs to:

- Analyze how this project's proposed school seats will add additional capacity at the primary school level once all 922 units and the number of school age children estimated.
  - What is the total number of school age children estimated the project will produce?
  - With today's unfunded seat deficit, will the number of unfunded seats increase or decrease? Decrease means in the context of this project that the number of school seats built by Alloy will reduce overcapacity in CSD 15 and the total number of unfunded seats in the district after it has absorbed the new students created by the project.
- Expand study area from 400' to one-half mile to more realistically assess project impact.
- Estimate the total number of residents generated by this project; assess their impact on area density and open space.
- Assess glare impact from glass tower.
- Assess light, air, air quality impact from project.
- Assess wind-noise impact from towers.
- Assess impact on Atlantic Ave subway station capacity and safety.
- Assess impact on sidewalk capacity along State Street and Flatbush, pedestrian flow and safety at key intersections.
- Assess impact on water/sewer load in study area.

- Assess impact of XX new residents on quality of life of a 5-story, brownstone neighborhood.

Respectfully,  
Andrea Esposito & Jean-Sebastien Sardo  
88 Wyckoff Street  
Boerum Hill

Ms. Jennifer Maldonado, Executive Director  
New York City Educational Construction Fund  
30-30 Thomson Avenue, Fourth Floor  
Long Island, NY 11101

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- Assess impact on water/sewer load in study area.
- Assess impact of XX new residents on quality of life of a 5-story, brownstone neighborhood.

Respectfully,

Andrea Esposito & Jean-Sebastien Sardo  
88 Wyckoff Street  
Boerum Hill

Dear Jennifer Maldonado,

Please find below my comments to **Draft Scoping for 80 Flatbush Avenue** project, from a very concerned neighbor.

1) impact radius must expand to a **minimum quarter mile** from the proposed project. At this scale, the extents to which the study shows as impacted area is laughable as this is HUGE comparative the size and scale of the immediate area.

2) specifically expanding on 1) above:

-**Light studies** must broaden

-**Traffic study** is woefully under-cooked (that is generous).

-**Subway/transit** inundation not fully understood in the study. While the site sits at the intersection of many subway Lines, it fails to bring to attention to the impact it will make on an increasingly burdened "hub" that seems to worsen daily.

-Aging **water** and **sewer load**

-**Air quality** pre and post construction.

-**Quality of life** both during and after construction.

-**Noise implications**

-Again, **traffic** is a nightmare in this area. CANNOT imagine how closed lanes, construction deliveries, work around the clock will contribute. **\*Minimum Quarter Mile Study Radius\***.

3) Loss of the iconic view of **Williamsburg Savings Bank** building. Further study on the proposed geometries / urban design should look at the obstructed view corridor of this landmark from the west and the south. The proposed designs clash with the local urban design in both **SCALE AND MATERIAL**.

4) school demand, while certainly needed, is hardly met with the addition of the proposed unit count. To say the project satisfies **classroom seat deficit** is ridiculous, as the net result of this project is a Further DECREASE in available seats.

5) Real concerns over impact on school related traffic in an already heavily congested area. **\*Minimum Quarter Mile Study Radius\***.

6) Wind study and further, noise studies due to tower geometry. As everyone is aware, the HUB tower on Schermerhorn howls and whistles under basic wind conditions, and creates true noise disturbances, particularly at night when asleep. This needs to be avoided IN DESIGN PHASE, not post construction.

7) Further development on parking concerns for the neighbors and pedestrian safety. What are the metrics of this study? **\*Minimum Quarter Mile Study Radius\***.

8) Impact of Rats on new development; how does the city propose to curb an infestation. **\*Minimum Quarter Mile Study Radius\***.

9) Impact of trash, cleanliness, and trash removal. When will traffic be removed from this site? Noise concerns. Needs further analysis.

10) what are the affects on Indirect residential displacement – and the effect on market value of homes on 400 & 500 blocks of State Street. **\*Minimum Quarter Mile Study Radius\***.

11) Concerns over Fire protection – access for Engine 226 down State Street and/or Third Avenue to Flatbush during construction and post construction in anticipation of construction lane closures.

12) More analysis on school buses on these streets in addition to current traffic load. **\*Minimum Quarter Mile Study Radius\***.

13) Lack of green space. Can the scale of the proposed block be reviewed to further increase open space at ground level to continue the greening of the neighborhood? While Fort Greene park is to the northeast, Boerum Hill lacks green space and greatly needs its own park.

14) In addition to shadow studies, **reflection** studies are very very important. All of these new glass edifices bounce back a substantial amount of solar radiation all over their southern neighbors, greatly raising the temperatures and causing **increased energy demands**. Not fair to increase the burden on these smaller homes and their families. **THIS IS A REAL ISSUE AND HAS YET TO BE STUDIED.**

15) **Location of Construction cranes**, and concerns over damage due to construction, deliveries of materials, scaffolding protection.

16) **Nightlight light pollution**? Is there a study of the affects on the immediate area?? **\*Minimum Quarter Mile Study Radius\***.

17) **Pedestrian Safety** – any 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.**

18) **Air quality** – what steps will be undertaken to reduce dust during construction?

19) **Neighborhood character** – “contribution to the neighborhood character” depends on which neighborhood is referenced, Flatbush towers or State Street brownstones. The brownstone character should be full weight in any review and not sacrificed to the downtown plan. **THIS IS BOERUM HILL, NOT DOWNTOWN BROOKLYN.**

20) **18 FAR** is preposterous. Would be happy for a bump in up-zoning, and feel there is a reasonable middle ground from an increase of the current 6 FAR. An increase by a factor of 3 however is excessive, and inappropriate in terms of scale and volume. While I am not a NIMBY, and am pro-development, the placement of the 70 story structure closer to the heart of the neighborhood and not on the Flatbush side is bizarre and does not contribute to strong urban design tenets. This seems very basic.

21) VERY VERY VERY concerned on my **property value**. While a new development has it's benefits, a development of this SCALE will DWARF our homes and cause real financial burden. I AM A TAX PAYER, GOOD NEIGHBOR, KEEPING MY HOME AND NEIGHBORHOOD CLEAN AND SAFE. THIS PROJECT, IN ITS CURRENT FORM **DAMAGES THE HARDWORKING TAXPAYERS WHO ARE ALREADY LIVING HERE.**

Thank you.

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EW

----- Forwarded message -----

From: Eric Farkas <ebfarkas@gmail.com>

To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>, Jessica Farkas <jessfarkas@gmail.com>

Cc:

Bcc:

Date: Thu, 6 Jul 2017 00:59:41 +0000

Subject: 80 Flatbush Avenue Scoping Questions & Comments

Hi- My wife, 16-month old daughter, and I live on State Street between 3rd and Flatbush and are VERY CONCERNED about this planned development. We are certain that this will negatively impact the neighborhood for the lengthy construction time period (at least six years but probably more). We are uncertain how it will impact the vibe of the neighborhood, and are concerned that it will completely change the dynamic of beautiful boerum hill in a negative way.

Along with other residents, I would like to request a study area of one-half mile around the proposed building (and not the 400 feet in the proposal). This will affect the studies of traffic, noise, water and sewer load, air quality and other quality of life issues. We should be thinking about this in such a way that it doesn't guarantee positive outcomes for the developers. Let's do what's right here and get a truthful, holistic view of what the impact will be. Then we can properly weigh pros and cons.

In addition to a shadow study, I would like to ask for wind noise and reflections to be predicted.

Lastly, the intersections around Atlantic Terminal are already amongst the worst with congestion, poor parking, and safety concerns for pedestrians. What does the board think the impact will be on traffic, transit, parking and pedestrian safety?

Thank you,

Eric Farkas

[ebfarkas@gmail.com](mailto:ebfarkas@gmail.com)

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**From:** bfeibusch@gmail.com  
**Sent:** Sunday, July 09, 2017 3:05 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** Comments on Draft Scope of Work for EIS 80 Flatbush

I live on Pacific Street, 5 blocks from proposed site. The study site must be at minimum 1/2 mile to one mile in all directions to account for new construction under way and new developments being occupied now. What is the impact of the proposed project with the increase of new units and people now coming on line?

Sewage. What is the impact of the new development in terms of sewage overflow going into the Gowanus area? And in heavy rainstorms and hurricanes when the low areas around the Gowanus get flooded?

Transportation. What is the impact of new increased population attempting to enter subway stations during peak hours? Consider beyond the Atlantic-Barclays stations since people will use trains at Nevins Street and Hoyt Schermerhorn. Will they be able to get onto a subway toward Manhattan? Are the platforms, especially Nevins Street wide enough to account for the large number of people. It is doubtful that so many people will be living in the development and working in the adjacent office space, as stated during the community meeting.

Bordering brownstone historic district. How does this proposal respect transitional zoning between downtown and low-rise residential blocks and a historic district?

Schools. The promise for a new building for KG seems to be the argument for the project. Since KG is a HS with students from throughout the borough and possibly beyond, a new building for KG does not have to be in the current site. Why can't SCA look for an appropriate site in other communities in Brooklyn near transportation? We support that the students need a 21st century school, but it doesn't need to be at this site. The promise of elementary seats does not state how many students are expected from the proposed residential apartments. How many students are expected by formula, to come from the 900 plus apartments? It sounds like the proposed 350 seats are not a net gain for the district, but rather seats for the development.

Traffic from UPS Fedex etc. If each family has three orders a week from amazon or similar, and half the families have deliveries of fresh direct, peapod etc., how many trucks will be riding down local streets daily? Loading dock near school? How to assure safety for the children right next to a loading dock? Constant deliveries? How will this be handled? Each of the deliveries yields boxes that must be broken down and disposed of? How many sanitation trucks are needed how frequently to account for this?

Mail. Currently the mail service is inadequate in the neighborhood. We don't get mail every day and many packages are lost. How will the new families and offices be accounted for by the post office?

Fire trucks. How will fire trucks access the area during construction and when the development is completed? How will fire trucks be able to turn if needed? What streets will they drive down? How much extra time will this take? Fire trucks on State (Nevins and Bond) currently have challenges in the area. What can be done to assure that fire safety will not be affected?

Light, air, parks. What can the developer do to create green space for the community as well as the residents of the buildings?

Betty Feibusch  
Pacific Street

Sent from my iPad

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**From:** Britton Fisher <britton226@aol.com>  
**Sent:** Friday, July 28, 2017 2:24 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 Flatbush

Dear Ms. Maldonado,

I have lived my entire life (54 years) in Downtown Brooklyn. I write to express my concern over the development of 80 Flatbush Ave. From all I can see the construction is simply too much and too close. I am not a letter writer per say and I certainly do not oppose all construction in a knee jerk fashion. A city is dynamic and always changing. There will always be something new ... I get that and nine time out of ten I am perfectly willing to embrace the changes. Our neighborhood though has seen so much growth ... perhaps too much and too quickly. The flavor, attractiveness, neighborly interaction have been lessened and there is simply an inability to assimilate the new into what we know to be great ... It is taking a terrible toll. In efforts to build things up the construction threatens to take things down. Please reconsider this project, it's scale, dimensions and consider the markedly negative impact on our neighborhood.

Respectfully,  
Britton Fisher  
226 Dean Street, Brooklyn

Sent from my iPad

From: Louie Fleck <ratnik@aol.com>

To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>

Cc:

Bcc:

Date: Fri, 7 Jul 2017 22:26:29 +0000

Subject: Re: Alloy Project. Please do a mile study area to include all the new high rises in Downtown, Fort Greene, Boerum Hill, Brooklyn Bridge Park. 400 feet is clearly inadequate.

Hi,

I was at your presentation at the Boerum Hill Group meeting a few weeks ago. As a local citizen, I am asking you to do a mile study area to include all the new high rises in Downtown, Fort Greene, Boerum Hill, Brooklyn Bridge Park. 400 feet is clearly inadequate. I am deeply concerned about the impact of this project on the neighborhood.

Thank you,

Louie Fleck

231 Bergen St

Brooklyn NY 11217

917-604-6688

From a mobile! Please excuse typos and brief responses

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**From:** WFLECKNAF@aol.com  
**Sent:** Thursday, July 27, 2017 9:44 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 Flatbush

We have lived in Boerum Hill since 1972 and have seen it become a vibrant, caring community. We restored the wonderful old houses--more often than not with our own hands. We raised our children here and we continue to love our neighborhood and to feel fiercely protective of it. Buildings of the size and scope as 80 Flatbush don't belong here. Don't let this happen.

Wanda Fleck  
718.855.3053

Brian Floca | 329 Atlantic Ave. Apt. No. 3 | Brooklyn N.Y. 11201

brian@brianfloca.com | 917 297 7541

27 JUL 04 1:36

Jennifer Maldonado  
Educational Construction Fund  
30-30 Thomson Avenue, Fourth Floor  
Long Island City, NY 11101

March 21, 2017

Dear Ms. Maldonado,

Having lived in Boerum Hill for the past sixteen years and having grown to love it, I am writing in opposition to Alloy's planned development at 80 Flatbush.

I note the developer's own selling points for the project, below (from <http://www.80flatbush.com/design>). I'm glad for what preservation is promised by Alloy for the historic buildings (provided, of course, those promises are kept), but it says something when the developer's own "Preserve historic fabric" diagram shows the planned destruction of the historic building that currently links the two buildings Alloy preserves to keep standing.

It says something, too, when the developers decide to show only about a fifth of what they propose to build in their very own "position density to respect the site" diagram. Even they seem to know how out-of-whack a full drawing of the building would look. It makes a joke of the phrase "respect the site."

### Urban Planning Concept



PRESERVE HISTORIC FABRIC



CELEBRATE NEW SCHOOLS



POSITION DENSITY TO RESPECT THE SITE

I wonder if we are not now entering the kill-the-geese-that-laid-the-golden-egg moment with Brooklyn high-rises. Out my bedroom window I now see growing a wall of towers, of high-end condos — none of which were there when I moved to the neighborhood — and the scale of the proposed Alloy tower would dwarf them all. I urge you to keep in mind the human scale of the neighborhood, and the historic texture of the blocks. There are parts of New York that are already full of interchangeable, gleaming, immense high-rises. But must it be the goal of the city that every corner of the city end up looking and feeling like those blocks?

Thank you.

Sincerely,

A handwritten signature in black ink that reads "Brian Floca". The signature is written in a cursive, flowing style.

Brian Floca

----- Forwarded message -----

From: Grace Freedman <[grace@5freedmans.com](mailto:grace@5freedmans.com)>

To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>

Cc:

Bcc:

Date: Thu, 27 Jul 2017 14:56:36 +0000

Subject: Questions regarding 80 Flatbush Ave, Brooklyn, Request for expanded study area  
Public comment and Questions 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](mailto:KhalilGibran80Flatbush@schools.nyc.gov)

Dear Ms. Maldonado,

I am writing with questions regarding the 80 Flatbush Avenue development. I also urgently request that the Study Area for the development be expanded to one-half mile or more to truly assess in the potential impact of this project on schools, traffic and transportation, and the overall neighborhood character.

Here are my specific questions:

-- Has the potential population growth of this area (Downtown Brooklyn/Fort Greene/Livingston St) due to other construction projects been taken into account to accurately measure the added impact of this development? Construction growth has been booming in this corridor and if each project is looked at alone, the city will not have a true and accurate picture of the impact on the neighborhoods.

--What are the specific measures that will be taken to judge impact?

--Will this proposal yield a net increase or decrease in the number of school seats currently needed either funded or unfunded? The size of the school seems very small in regard to the need, especially with a growing school population in District 15.

--Has the traffic plan been developed with the most up-to-date information from the Department of Transportation? What is the plan to work with DOT to assure pedestrian safety and traffic calming? DOT has recently proposed to the community a new traffic flow plan around BAM and Times Plaza that promises increase pedestrian safety. I hope this DOT plan proceeds and will improve this area for residents. But new residential developments like this, can potentially overload the system with more resident drivers, more loading needs and of course more people.

--Is there current capacity at the Nevins 2/3/4/5 subway station, which has particularly narrow entrances or bus stops on Flatbush Ave, which already impede the flow of traffic, to accommodate the potential growth?

As a neighbor resident, parent of public school children and advocate for pedestrian safety, I forward this questions and again ask that the study area be expanded so that it can truly yield the information the city and the neighborhood needs to best understand the impact of the development proposed at 80 Flatbush Ave, Brooklyn.

Thank you for your consideration.

Grace Freedman  
Boerum Hill resident  
37 Saint Marks Place  
Brooklyn, NY 11217

[grace@5freedmans.com](mailto:grace@5freedmans.com)

Kate Galassi  
445 Pacific Street  
Brooklyn, New York 11217

July 27, 2017

Jennifer Maldonado, Executive Director  
NY Educational Construction Fund  
30-30 Thompson Avenue  
Long island City, NY 11101

10 AUG PM 3:41

Re: Scope of proposed Development of 80 Flatbush Brooklyn

Dear Ms Maldonado,

I am writing to ask that the scope of the environmental impact statement include the following:

-The area of study must include a minimum of a one mile radius for all traffic impacts and a minimum half-mile radius for all other impacts.

- The traffic study should be based on recent re-zoning and policy decisions affecting all streets and especially the effects of the high density residential and school building on the adjacent brownstone community, especially because the loading docks for residential are currently located on State Street facing turning this street into a thoroughfare

-Analysis framework for environmental review, Table 1:

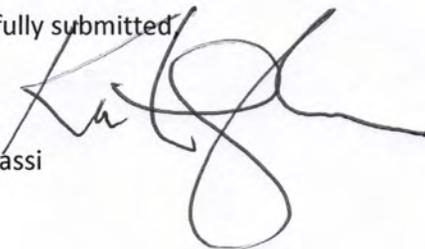
The comparison should show a "No Action" alternative with each "Action Scenario." The statement should show costs/benefits for a project built "as of right" without government support, "as of right" with customary J-51 and inclusionary program discounts, and also for a project built with a lower FAR than the proposed FAR18.

- The project should include a detail analysis of the impact on school capacity, specifically whether the additional school slots will alleviate current overcrowding or whether new residents will add more students than the number of new slots being built.

- Proposed project drawings: accurate elevations for all buildings from all directions should be included for the developer's proposal as well as for a project with a reduced FAR.

Respectfully submitted,

Kate Galassi



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**From:** Jaime Garamella <jgaramella@gmail.com>  
**Sent:** Thursday, July 27, 2017 4:13 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 Flatbush Comment

Dear ECF:

I am writing in response to the proposal at Khalil Gibran and 80 Flatbush. It appears that the proposed housing mix is 80/20, however, given the housing price pressure on middle and low income families, this strikes me as unbalanced. I would suggest the committee adopt a 50/30/20 approach, at very least, to ensure that more middle and low income Brooklynites can live alongside their wealthier neighbors. The more income diversity a building and neighborhood has, the better Brooklyn will be for it.

Why, you ask? Well, most would agree that the opposite effect, wherein neighborhoods become increasingly insulated by income gaps, has a terribly stagnating effect on upward mobility. We must attempt, at every opportunity, to remedy this by ensuring the opposite. It may not provide maximum profits but it is undoubtedly more right, more equal, and more American. Sometimes maximum profit is at odds with what is right, but the light of righteousness shines brightest, longest, and furthest. I humbly urge the committee to do what is right -- and 80/20 is, in my humble opinion, not quite right.

I may be reached by phone or email for further comment.

Yours,  
Jaime Garamella  
270 1st St  
Brooklyn, NY 11215

617-429-1812

From: "Dr. Sarah Garraoui" <drsarahgarraoui@gmail.com>  
To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>  
Cc:  
Bcc:  
Date: Mon, 10 Jul 2017 21:17:02 +0000  
Subject: State street

State street and Boerum Hill are a wonderful part of Brooklyn. State street is a lovely block tree filled with 4 story brownstones, a few neighborhood shops, a fire station, a Buddhist Temple, the YWCA, a church, a community center and a few special schools.

The neighborhood is centrally located to the major transit hubs, Downtown Brooklyn and now Barclays stadium. The surrounding neighborhoods are exploding in height with very little oversight and thought to city planning especially in regards to schools and traffic.

I am absolutely thrilled there is a plan for more schools locally. We desperately need good middle schools as well as better elementary and high schools.

Except for the bribe of the schools on this site, this plan is completely wrong for the character of the neighborhood. It is too densely populated and the buildings are too tall. It may be one thing for Flatbush Avenue or Schermehorn to have very high mixed use buildings, but it is entirely different to take a small local neighborhood block and have it overwhelmingly dominated by huge tall densely populated building that would already overpopulate the current schools it is proposing.

The FAR should be in line with the other buildings 6-8 stories maximum, in my opinion. These limits are there to protect the ecosystem of a neighborhood. If you allow a building this tall and densely populated to be built on a Brownstone neighborhood block that already welcomes many other services and businesses it would truly be a travesty.

The issues that need to be looked at are:

1. top heights of buildings on residential Brownstone blocks
2. Traffic issues
3. Population density issues: schools, trash, sewage, etc
4. Wind tunnel, sound and light issues from such a tall building  
(There are currently new issues from some of the new buildings on schermerhorn.)
5. Complete disregard for maintaining the current status of a neighborhood block

I am a resident on State street one block over with two school age children. We chose this part of Brooklyn for its character, charm and proximity to Manhattan and services.

I strongly oppose this tall development on State Street. The building height should be a maximum of 6 stories. We don't want high rises on Brownstone blocks.

Dr. Sarah Garraoui DPT  
461 State street owner

From: Jonathan Glazer <glazer101@gmail.com>  
To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>  
Cc:  
Bcc:  
Date: Mon, 10 Jul 2017 20:06:36 +0000  
Subject: 80 Flatbush Avenue Scoping Comments  
Ms. Jennifer Maldonado, Executive Director  
New York City Educational Construction Fund  
30-30 Thomson Avenue, Fourth Floor  
Long Island City, NY 11101

Dear Ms. Maldonado:

As a Boerum Hill resident who will be directly affected by the proposed 80 Flatbush development, I am writing to you regarding the Draft Environmental Impact Statement (DEIS) for the project.

In general, the scope of the DEIS is far too narrow to accurately measure the potential impact these building will have on the local Boerum Hill community. Over the last ten years, this section of Boerum Hill has experienced a radical transformation of its "backyard." Within a very small radius of the site, the Barclay's Center and multiple high rise building have been constructed resulting in frequent and significant disruption of the neighborhood's quality of life. Construction noise and debris, changes in traffic patterns with their increased congestion and threats to pedestrian safety, littered streets, drug use and sales by construction workers, and scarcity of street parking are all by-products of these developments. Previous EIS studies associated with Barclay's arena and the 2004 Downtown Brooklyn zoning plan ignored these very predictable outcomes and neither the New York City government or the private developers responsible for these conditions have sought to redress them. The proposed DEIS makes no effort to take these currently unacceptable conditions into consideration in the scope of work as it is currently construed.

Specifically, the methodology employed in the traffic section of Task 11-Transportation is woefully inadequate. Having traffic counters at various intersections on random days is the equivalent of announcing a flood watch on a day when it isn't raining. Following the closing of the northbound 4th Avenue/Flatbush Avenue intersection and the rerouting of that traffic onto 3rd Avenue has created extreme congestion when certain conditions exist. These conditions include construction or crane activity, traffic accidents, and prolonged duration of delivery trucks along that corridor among others. In the presence of these conditions, the safe and quiet neighborhood streets are transformed into a noisy, aggressive and hostile environment. Frustrated drivers flaunt traffic laws and endanger the lives of pedestrians, including the many local residents who are elderly or require walking assistance. Any EIS that does not document these "flood like" conditions will not be able to faithfully consider the further impact the construction and occupation of 80 Flatbush will have on the neighborhood. Given that this project includes an elementary school, failure to do so would be tantamount to professional negligence on the part of ECF, Alloy and AKRF.

In addition to not incorporating the neighborhood's history, the DEIS is also ignoring the future impact the recently constructed buildings in downtown Brooklyn, both within and just outside the 400 foot study area, will have on Boerum Hill once they are occupied. These changes could

take place after the completion of the EIS but before the 80 Flatbush project has even broken ground. Downtown Brooklyn is a moving target and the scope of the DEIS must make a far more serious effort to reflect that reality.

To ensure that EIS process is legitimate and both responsive and responsible to the concerns of the neighborhood, I recommend that all work on the DEIS be put on hold until a more appropriate scope of work has been determined.

Sincerely,

Jonathan Glazer

----- Forwarded message -----

From: ed goldman <edbths@gmail.com>

To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>

Cc:

Bcc:

Date: Wed, 26 Jul 2017 13:50:25 +0000

Subject: Re: 80 Flatbush Ave

Dear Ms. Maldonado,

Although I am a resident of Fort Greene and not Boerum Hill I do not live far from the intersection of Flatbush and Schermerhorn Avenues. Below are some of my thoughts concerning the proposed construction at 80 Flatbush Avenue, Brooklyn:

80 Flatbush Avenue is not located Downtown Brooklyn. It is clearly a part of the Boerum Hill community, Our communities that surround the Downtown Brooklyn hub have already been inundated with the construction of new tall buildings. These buildings are totally out of character with the historic and architecture of our communities and space in them are generally financially out of reach to the long time residents of our communities.

These buildings have also brought in huge numbers of people into our communities who not only overwhelm the infrastructure of our communities but also are rapidly changing the class character of our communities. Few of the new apartments in these new structures, and this would also be true of 80 Flatbush, are either financially accessible or size appropriate to the large numbers of poorer and working people who have long lived in our communities.

80 Flatbush will not only not relieve the overcrowding of local schools, a problem that has resulted from the overbuilding in our communities, but will exacerbate the conditions by bringing in even more new residents. Nine hundred new apartments are likely to bring in hundreds of new children to the community. Not only will this have an adverse impact on local schools and other facilities regularly used by local youth, it will similarly tend to help to further overwhelm the transportation infrastructure of our community.

I could go on but I am sure you are hearing from others of my neighbors. I hope you will recommend that this project be rejected or at the very least severely scaled down.

Respectfully,

Edward Goldman  
80 Vanderbilt Ave.  
Brooklyn NY 11205

----- Forwarded message -----

From: gene golub <[gene\\_golub@hotmail.com](mailto:gene_golub@hotmail.com)>  
To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>  
Cc: "[rbearak@brooklynbp.nyc.gov](mailto:rbearak@brooklynbp.nyc.gov)" <[rbearak@brooklynbp.nyc.gov](mailto:rbearak@brooklynbp.nyc.gov)>, "[simonj@nyassembly.gov](mailto:simonj@nyassembly.gov)" <[simonj@nyassembly.gov](mailto:simonj@nyassembly.gov)>, "[montgome@nysenate.gov](mailto:montgome@nysenate.gov)" <[montgome@nysenate.gov](mailto:montgome@nysenate.gov)>, "[slevin@council.nyc.gov](mailto:slevin@council.nyc.gov)" <[slevin@council.nyc.gov](mailto:slevin@council.nyc.gov)>  
Bcc:

Date: Thu, 20 Jul 2017 00:43:05 +0000  
Subject: 80 Flatbush  
Hello Jennifer Maldonado

I am against 80 Flatbush project.

The face of Brooklyn is not 38 or 76 story towers.

Brooklyn is loved and known not for high story building. Building the towers will change the face of the neighborhood.

Gigantic towers will do good to developer only and not anybody else, not to people who live in the neighborhood and not to people who may live here if towers are built.

Do we care about developer financial interests or public interests?

There are other concerns too:

Why there is a pressing need to change existing zoning? Can't developer find under developed area where new development would be welcome news?

Why project need to be funded by taxpayers money? This is a purely commercial enterprise so business should fund itself. Use of public money to enrich business is qualified as fraud.

Taxpayers money should be used directly to the cause if was originally meant – schools – not to help the developer to build towers.

Adding towers is going to create the gridlock to the area which is already under huge pressure of overcrowded subway.  
streets are congested every morning and night.

Thank you,  
Gene Golub.  
1 Hanson place apt. 11 L  
Brooklyn, NY 11243

From: "douglas@lkdg.com" <douglas@lkdg.com>  
To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>  
Cc:  
Bcc:  
Date: Fri, 7 Jul 2017 00:48:18 +0000  
Subject: 80 Flatbush

I have lived and worked in the Boerum Hill neighborhood , on and off since the early 1980's. The development of Atlantic Ave has been slow and steady over the years, but some of these new high rises seem way , way out of scale ( in terms of impact).

Why are the study areas limited to 400 feet? 10 blocks is a half a mile. And even that seems too small a perimeter to study, considering the height of these proposed buildings.

Right now, our underground electric cables regularly catch fire or blow manhole covers.

What is the real impact on the subway system? Will Brooklyn now suffer the way that the 4,5,6 trains overcrowd? Will we have to wait for three trains to go by in order to squeeze in?

I am a NYS Emergency Medical Technician and I am concerned about response times for Engine 226 and the NYFD medical services located nearby.

What are the parking implications of these buildings?

Please consider the quality of life of the residents who have supported this neighborhood for generations, before it is compromised for commercial gain. Brooklyn needs more housing, but it does not have to emulate Manhattan towers in profile

thanks for your time

douglas gray

Douglas Gray  
Gray Matters Presents.com  
917.678.6430

“You Can’t Make It Up”  
It’s not so much a blog, as just what happened this week...  
Subscribe

----- Forwarded message -----

From: Grant Greenberg <grantgreenberg@gmail.com>  
To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>  
Cc: "ojonas@nysenate.gov" <ojonas@nysenate.gov>  
Bcc:  
Date: Thu, 6 Jul 2017 14:47:46 +0000  
Subject: 80 Flatbush Avenue Development  
Dear Ms. Maldonado --

I am a resident at One Hanson Place in Brooklyn and am writing to express my deep concern about the proposed development at 80 Flatbush Avenue. Whilst I support the creation of affordable housing units and adding school seats to the district, this development does not add sufficient benefit to the neighborhood for it's scale. What's more it will forever alter the character of our neighborhood.

The towers proposed are extremely large to be on the same street as 3-4 story high brownstones and way too close to Boerum Hill. Also, this developer does not have sufficient experience building such a large project in such a sensitive location.

One a personal note, as a longtime Brooklyn resident I am concerned by the fact that sightlines to One Hanson place -- the most iconic building in our Borough will be blocked by this building.

Our neighbor at 330 Ashland place was encouraged by the city to alter their design to preserve the signtlines to One Hanson's architecturally significant and landmarked clocktower. No such provisions have been made by the developer of 80 Flatbush. Indeed, the height of the shorter tower is close to the height of One Hanson Place and would block all views of the clocktower from Western Brooklyn. Views of the clock from Cobble Hill, Brooklyn Heights, Boerum Hill, and downtown Brooklyn would all be compromised.

A development of this scale seems completely inappropriate for this location and I hope you will hold the developer to the highest standard as they present impact studies on this project as it will have major impact on our community.

For starters, I hope you will mandate that the developer expand the studies from a 400ft radius to a half mile radius. Also, in addition to the studies already proposed, I hope you will require the developer to produce a shadow study as well as a surface reflection study.

Also, perhaps the developer should be asked to present an alternate proposal where all the high-rise portions of the site are on the Schermerhorn Street side of the site, i.e. closer to downtown Brooklyn. That way the low-rise brownstone character of State Street would not be so significantly compromised and One Hanson's clock would also be more visible from the West.

Thanks for your review.

Kind regards,  
Grant Greenberg  
One Hanson Place, Apt. 28A

From: Robert Grimm <apparebit@gmail.com>  
To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>  
Cc: "ojonas@nysenate.gov" <ojonas@nysenate.gov>

Bcc:

Date: Mon, 10 Jul 2017 13:56:07 +0000

Subject: 80 Flatbush, Brooklyn

I am writing to express grave concerns about the proposed 80 Flatbush Ave project in Brooklyn. For background, I've been an owner and resident of a condominium at 1 Hanson Place since the building was condo-converted. One of the joys of living in this neighborhood has been watching the neighborhood come into its own, thanks in part to many well-designed and interesting mixed-used buildings going up around me. 300 Ashland deserves special mention here since Two Trees and Ten Arquitectos not only came up with a great design but also ensured that it fits into the neighborhood, including by preserving the sight lines onto One Hanson. Clearly, we have a self-interest here but, as caretakers of one of the most recognizable buildings in all of NYC, we also have a responsibility to preserve not only the building itself but also its position as anchor of a great neighborhood. Mind you, the growth around me also has negative consequences. Atlantic Avenue station has become markedly more crowded at commute time over the last 8 years. But that is a trade-off I can happily live with, given all the other improvements to the neighborhood.

The problem is that 80 Flatbush endangers all of that. It is too large when compared to the other towers in its vicinity. It would mostly destroy the sight lines onto One Hanson and onto 300 Ashland from the West as well, simultaneously depriving residents of Brooklyn of an important and consistent visual landmark — quite literally as I have met many a resident who orients themselves via One Hanson — and negating all the work and money Two Trees, Ten Arquitectos, and representatives of my building have expended towards developing a truly great ensemble that juxtaposes the old and the new.

Furthermore, while Two Trees is a known quantity in the borough — I work in technology yet knew of them and their architect long before they proposed 300 Ashland — this does not seem to be the case for Alloy. Their portfolio is much smaller and on a smaller scale, which directly translates to a real risk that the relative inexperience will lead to construction delays or even project failure. Just look at the travails of Forest City Ratner, which despite decades of experience and direct support by city/state had significant construction and financial difficulties in getting the Atlantic Yards development off the ground.

In summary, 80 Flatbush is out of scale and being developed by an unsuitable company. We can and must do better in developing an awesome neighborhood. I hope I convinced you that while I have a direct stake in this, I am not your typical parochial nimby. The borough must grow and it must do so upwards. But we also need to do so within scale and with respect to the history of the borough, our beloved center of the known universe!

Sincerely,

Robert Grimm  
1 Hanson Place #15M

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**From:** Lauren Gropp Lowry <laurengropplowry@gmail.com>  
**Sent:** Monday, July 10, 2017 12:53 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** Schools

To whom it may concern,

A building of the size of 80 Flatbush should have to invest in more schools than planned. As a lifelong resident of Brooklyn, I cannot sit by while so much new development takes place in district 15 with so little investment in our public schools.

Best,  
Lauren Gropp Lowry

Sent from my iPhone

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From: Melissa Guion [<mailto:melissaguion@me.com>]  
Sent: Thursday, July 06, 2017 2:42 PM  
To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>  
Subject: Dra. EIS for 80 Flatbush Avenue

Jennifer Maldonado, Executive Director  
  
New York City Educational Construction Fund  
  
30-30 Thomson Avenue, Fourth Floor  
  
Long Island City, NY 11101

Dear Ms Maldonado,

Thank you for the opportunity to comment on your draft EIS for 80 Flatbush Avenue. As a member of the Boerum Hill community, I have a number of questions and concerns.

First of all, many of us living on Dean St. have been suffering from wind noise from the new HUB building on Schermerhorn St., which is even further from us than the proposed 80 Flatbush project. Numerous wind noise complaints have been registered with DEP. I feel the proposed Study Area of 400 feet is inadequate. The study area should extend for a half mile, and should include Dean Street, so the impact on our block will be addressed. I would also like to see how the traffic, water and sewer load, air quality, and other quality of life measurements would be impacted on Dean Street.

Second, how many school aged children will result from over 900 units of housing? How will the city address the current school seating deficit?

Given that the community has little open space, how does the city propose to ensure open space for the community while increasing the number of residents? There are only a few small parks in the neighborhood with little green space and broken equipment. Children are already breaking into locked school playgrounds with wire cutters and climbing dangerous fences to find space to play.

In addition to a shadow study, I would like for reflections to be predicted, and I would also like to know how many bird strikes are predicted for the tower, considering the materials used, and whether bird strikes can be mitigated?

I would like to know how the current response time of Engine 226 will compare with response time during construction with staging on State Street and staging on Third Avenue?

I would also like to know how pedestrian and bicycle traffic will be addressed, including young children walking to school? How much will commercial vehicle traffic increase on local streets? How much more double parking will occur due to deliveries? How will pedestrians and cyclists be kept safe with the proposed increase in commercial traffic, as well as an increase in private vehicle traffic due to the addition of parking spaces?

These are only a few of my many questions. I hope you will take local residents deep concerns about the changes in our beloved community into account.

Thank you,  
Melissa Guion  
264 Dean Street #2  
Brooklyn, NY 11217

From: "William L. Harris" <brownstones@gmail.com>  
To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>  
Cc:  
Bcc:  
Date: Tue, 25 Jul 2017 19:32:40 +0000  
Subject: Scoping 80 Flatbush

Comment by nearby homeowner in Boerum Hill and resident in the neighborhood since 1970, 47 years. This preposterous concept deserves and should not receive more than one atom more in size and scope than allowed by current zoning. That public schools might be beneficiaries of expanded volume weighs for nothing in my view. School planners have known for at least 20 years that more seats were going to be required to accommodate the growing population in public schools. As to the developers of 80 Flatbush I cannot conceive of any reasonable justification to grant greater volume because the school planners were irresponsible.

Nor do I see any justification for closing the slipway connecting Third Avenue and eastward Flatbush Avenue. The little oasis formed by Schermerhorn/Third Avenue/Flatbush must remain as is, a dot of public amenity and necessity to partially offset the gross brutality of 80 Flatbush, even if built no greater than allowed by zoning.

William L Harris, 393 Pacific Street, Boerum Hill. brownstones@gmail.com

---

**From:** Claude Hersh <claud.hersh@gmail.com>  
**Sent:** Monday, July 10, 2017 4:14 PM  
**To:** Khalil Gibran 80 Flatbush  
**Cc:** montgome@nysenate.gov; simonj@nyassembly.gov; slevin@council.nyc.gov  
**Subject:** 80 Flatbush Avenue Project

I am writing to express my concerns about the proposed 80 Flatbush Avenue project being developed by Alloy along with the Education Construction Fund. I am an owner and resident of 1 Hanson Place. I have many concerns about this project.

First, I am troubled by the procedures followed by the ECF - since there appear to have been **no** procedures. I knew that a development was being contemplated by ECF at the location of the Khahil Gibran High School and was regularly following the ECF website to learn more about the project. Specially, I knew that a Request for Expressions of Interest needed to be issued so I was expecting to see one. I also regularly completed google searches for the project and the RFEI. I never found anything until the press conference was held to announce the project.

In regards to this project and all future projects, I strongly request that ECF adopt better practices to ensure that there is transparency in developing projects.

Due to the lack of transparency, I have a number of unanswered questions:

1. What was the public RFEI process?
2. Where is the original RFEI document?
3. When did the process begin?
4. Who were the other bidders?
5. How was it decided to award the project to Alloy?
6. Who worked on awarding this project to Alloy?

Further, how did ECF gain control of the building operated by the New York City Human Resources Administration? Or was the award of that property a separate transaction. If it was, who oversaw that transaction and what procedure was followed?

Second, I request that the environmental impact statement be prepared for an area larger than the one presently proposed. I request that the area scoped be one mile in radius.

Third, I request further study on whether schools should be built on this plot. I live across the street from the plot and the noise, particularly during the day, is horrendous. I cannot image high school or middle school students actually being able to concentrate on their studies amid sirens, jack hammering, and car horns.

Fourth, I strongly oppose the FAR increase requested by Alloy. The requested increase is unprecedented and unjustified. Further, the requested exception to the setback requirements would have a detrimental impact upon the entire neighborhood. The simple fact is that building two tall towers on this plot will adversely alter the character of this neighborhood.

Fifth, several months ago, I attended a community meeting about the Department of Transportation safety plan for this neighborhood. One of the major points made by DOT was that there was little that it could do but make small changes here and there. While virtually none of the minor changes suggested by DOT have even been

done, ECF and Alloy now propose drastically increasing the traffic and pedestrian congestion. Other than agreeing to pay for some minor improvements (if they even are improvements) at the corner of Flatbush and Schermerhorn, no improvements are even proposed.

Sixth, what is being done by the developers to improve public transportation?

Seventh, why isn't more green space being incorporated into the project?

Eighth, what steps are being taken to ensure the actual construction will be completed safely and with minimal impact on the neighborhood?

Ninth, I ask that the EIS address the following additional issues: glare, wind and shadows.

Finally, the building of 1 Hanson Place - where I reside - has long been a symbol of Brooklyn. The views of it are iconic. Construction of this project as presently proposed would simply destroy those iconic views. I ask that require ECF and Alloy to alter their proposal so that the sight lines of OHP will not be so negatively affected.

Thank you for considering my comments.

Claude Hersh  
1 Hanson Place, #22F  
Brooklyn, New York 11243  
718-637-3617  
[claude.hersh@gmail.com](mailto:claude.hersh@gmail.com)

---

**From:** Phillip <pahogue@yahoo.com>  
**Sent:** Friday, July 28, 2017 1:47 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 Flatbush proosal

I wish to add my voice to the chorus that says this outlandishly excessive building is out of context with the area it is located in, does not provide any meaningful compensating amenities for the community, and will create a greater need for classroom seats than the small school included in this proposal. This type of give away of public space and tax revenues to rich real estate interests for no comparable return to the community must stop.

Phillip Hogue  
resident pacific street between Bond and Nevins Sent from my iPhone

---

**From:** Melanie Holcomb <melanie.holcomb@gmail.com>  
**Sent:** Thursday, July 27, 2017 8:28 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** So much to like and yet. . .

Please, please, we want a human-scaled city. Enough of these insanely tall, out of scale buildings that take our commonly shared light, air, and views and gives them over to private individuals. Please bring this building down a dozen or two dozen stories, and you will find much more support in the neighborhood (including my own) for a project that will deserve it.

Sincerely, Melanie Holcomb

1.

----- Forwarded message -----

From: Susan Holman <s.marie.holman@gmail.com>

To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>

Cc:

Bcc:

Date: Tue, 25 Jul 2017 20:29:44 +0000

Subject: 80 Flatbush Development EIS Scoping

Jennifer Maldonado, Executive Director

New York City Educational Construction Fund

30-30 Thomson Avenue, 4th floor

Long Island City, NY 11101

Dear Ms. Maldonado:

I am a long time Boerum Hill resident and I write to express my grave concerns about the 80 Flatbush development. This excessively large twin tower proposal is inappropriate for Boerum Hill and will have a significantly negative impact on the quality of life in this community. This proposal would locate the tallest buildings in Brooklyn immediately adjacent to a low-rise residential community which is a violation of transitional zoning and design context. Moreover the study area of 400 feet is wholly inadequate to study the impacts this massive development would have on air quality, sunlight, transportation, congestion, adequacy of fire and police services, etc. and therefore a 1/2 mile study radius is needed. For a more informed study, the EIS should include drawings and elevations of the No Action plan as well as comparison elevation of heights of buildings over 12 stories in the area. And these 2 massive towers are proposed without any open green space for the community! While this development may be good for the developers, its disproportionate scale will overwhelm the neighborhood. I understand that the proposal includes some additional school seats and affordable housing, but the negative impacts due to the disproportionate scale of this development will likely far outweigh any of these gains.

I urge you to conduct a level of EIS scoping (robust) that is in line with the magnitude (huge) of the proposed development. Please do not allow residential Boerum Hill to be thrown under the bus in the name of "progress".

Thank you,

Susan Holman

544 State Street #1

Brooklyn, NY 11217

----- Forwarded message -----

From: "Hughes, Carolyn" <carolyn.hughes@vanderbilt.edu>

To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>

Cc:

Bcc:

Date: Fri, 28 Jul 2017 21:08:57 +0000

Subject: Please vote down 80 Flatbush

I live at 467 Pacific Street between 3rd Avenue and Nevins. Our community, Boerum Hill, cannot support this huge development in terms of increased parking, school enrollment, traffic, and open space. The location is in Boerum Hill, which is a neighborhood of low-rise buildings. This neighborhood cannot support two high rises (one 74 stories).

Please stand against this proposal.

Carolyn Hughes

467 Pacific Street

Brooklyn NY 11217

From: Hughes, Alex MD [mailto:HughesA@HSS.EDU]  
Sent: Wednesday, May 31, 2017 6:30 AM  
To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>  
Subject: concerned resident over 80 Flatbush

Attn: Jennifer Maldonado:

I am the owner of 471 State street (on the corner of 3rd Ave and State Street). I would like to go on record that I strongly oppose the current design for the 80 Flatbush project. Not only does the current density far exceed current density limits, the project is not contextual. The project should be scaled to 1 large tower along Flatbush while keeping the rest of the footprint low rise. This would be in keeping with the vision of downtown Brooklyn to develop the Flatbush corridor to Barkley's while keeping the rest of Boerum Hill low rise. The historic street wall on 3rd Ave should be maintained and is an asset to the whole area. Maintaining a shell of two historic buildings on the corner of this project, while changing the street wall flies against any standard of historic preservation.

I and others look forward to the public hearing on June 28th. A careful reconsideration of the current project could garner more support of local residents.

-----  
Alexander P. Hughes, MD  
Spinal Surgery  
Assistant Professor  
Hospital for Special Surgery  
Weill Cornell Medical College

Office Location:  
523 East 72nd Street  
New York, NY 10021  
tel 212-774-2992  
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----- Forwarded message -----

From: Renee Ifill <[ifillrenee@gmail.com](mailto:ifillrenee@gmail.com)>

To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>, "[slevin@council.nyc.gov](mailto:slevin@council.nyc.gov)" <[slevin@council.nyc.gov](mailto:slevin@council.nyc.gov)>, "[simonj@nyassembly.gov](mailto:simonj@nyassembly.gov)" <[simonj@nyassembly.gov](mailto:simonj@nyassembly.gov)>, "[mongome@nysenate.gov](mailto:mongome@nysenate.gov)" <[mongome@nysenate.gov](mailto:mongome@nysenate.gov)>

Cc:

Bcc:

Date: Wed, 19 Jul 2017 23:46:35 +0000

Subject: 80 Flatbush, Brooklyn - Vote NO

The proposal of this building is disrespectful to the community, creates a monstrous eyesore into the heart of a residential street, blocks all the views from the landmark Williamsburg Savings Bank building and will exacerbate an already horrible traffic issue.

Most importantly, it will add to the issues of school overcrowding and student safety concerns. Flatbush, one of the main arteries to the rest of Brooklyn will become clogged and unusable -- as well as unsafe for everyone.

Please don't allow this to happen. I do not want my taxes to pay for this.

Thank you.

Renée Ifill

Resident of One Hanson Place, Brooklyn, NYC

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----- Forwarded message -----

From: Sarah James <sjames@phillipsoppenheim.com>

To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>

Cc: Stuart Farr <stuartfarr2@gmail.com>

Bcc:

Date: Fri, 28 Jul 2017 20:05:38 +0000

Subject: Alloy Development

Jennifer Maldonado

Executive Director

New York City Educational Construction Fund

I am writing to express my great concern over this overly large twin-towered Alloy Development proposal spotted for Boerum Hill, which is NOT downtown Brooklyn, as spun by the developers. I dislike NIMBY thinking and generally welcome the changes a neighborhood experiences, but this development is excessive and does not honor the very scale and context that makes the neighborhood desirable to begin with. I also welcome the schools and the affordable housing-- needed as they are--but not if it overwhelms the neighborhood it supposedly serves.

In brief:

This development is located in Boerum Hill not downtown therefore the density is excessive--as I mentioned above.

Locating the tallest tower in Brooklyn next to low-rise residential buildings is a violation of both transitional zoning and the design context.

The study area of 400-feet is inadequate to study all the indirect impacts. It should be a half-mile radius.

For a more accurate and informed study, the EIS should include drawings and elevations of the No Action plan as well as a comparison elevation of heights of all buildings over 12-stories in the study area.

The development does not include any open space for the community. While green space is shown on the roofs of the schools, they are small and likely not accessible to the public, and even if that were possible it would require restrictive time constraints.

Thank you for considering the community's input. We live here. We know. It matters.

Best,

Sarah James

---

**From:** Anand Jayachandran <a.jayachandran01@gmail.com>  
**Sent:** Monday, July 10, 2017 5:15 PM  
**To:** Khalil Gibran 80 Flatbush  
**Cc:** montgome@nysenate.gov; simonj@nyassembly.gov; slevin@council.nyc.gov  
**Subject:** 80 Flatbush - Public Comments

Hello. I'm a resident of Fort Greene and would like to express my concerns with the proposed 80 Flatbush Ave project.

I realize that the project may still go through, but the project should be subject to the following criticisms and guidelines below. As the local representatives associated and affected by this project, it's important that you hear local citizens' voices.

- **Location & Zoning of 80 Flatbush project**
  - The project is being proposed as a part of Downtown Brooklyn, yet 80 Flatbush does not fall into the city-defined boundaries of Downtown Brooklyn. **Given zoning in Boerum Hill / Fort Greene, residential zoning limits should dictate the size of the building**
  - Additionally, the FAR increase request from 6 to 18 is 3x what Boerum Hill is zoned for. Note that no area of Downtown Brooklyn is even zoned above C6-4. **Why would we treat Boerum Hill or Fort Greene differently for FAR exceptions?**
- **Qualifications of Alloy**
  - While Alloy may be a great firm, the fact is that **Alloy has not demonstrated expertise/ability to complete an enormous project.** I realize that you need to box outside of your weight class to grow, but this is an extremely large step for a firm whose largest project is a 42-unit boutique condo in DUMBO
  - **My concern is that the project will become poorly mismanaged, cut corners to finish, or never be completed on time** (leading to all the negative neighborhood conditions associated with unfinished projects). **A solution would be to reduce the size of the building(s) considerably.**
- **Environmental & Traffic Impact**
  - It's unacceptable that the impact assessment only covers a 400-foot radius around the site
  - **Given the magnitude of residents, traffic, and businesses that occupy this area, the impact assessment should cover a 1-mile radius**
- **Public Green Space**
  - The neighborhood's limited green spaces are already congested and overused
  - **Why is this project not offering any additional public space or green space like the public plaza recently opened at 300 Ashland?**
- **Construction Impact**
  - This is a long project expected to take 8 years. There will be lots of construction noise, debris, and other pollution that will negatively impact local residents, employees, and tourists in the area
  - **What limitations/guidelines will be followed by Alloy to minimize the impact on the community?**

I hope you seriously consider my comments and concerns when evaluating your decision about the proposed 80 Flatbush Ave project. Thank you for your time.

Regards,  
Anand Jayachandran  
1 Hanson Place

From: David Karp <david.e.karp@gmail.com>  
To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>  
Cc:  
Bcc:  
Date: Fri, 7 Jul 2017 23:02:52 +0000  
Subject: Comment on 80 Flatbush project  
Hello,

I am a resident of the Downtown Brooklyn/Fort Greene area and would like to express my concern about a large-scale building replacing the current low-rise storefronts at 80 Flatbush. In particular, I've noticed that the area outside Atlantic Terminal is already extremely windy. When walking down Flatbush from the Manhattan Bridge toward Atlantic Ave it becomes very obvious in the last few blocks that the wind increased dramatically. I've had a cabbie nearly lose his door when I opened the smallest amount on Hanson Place. I'm worried that addition of another large building, if not properly studied and modeled, could exacerbate this problem to the point of serious impact on pedestrian comfort and safety. I hope any future development discussions take this issue to heart.

Sincerely,  
David Karp

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**From:** Keith, Barker <Barker.Keith@Chubb.com>  
**Sent:** Monday, July 10, 2017 3:03 PM  
**To:** Khalil Gibran 80 Flatbush  
**Cc:** montgome@nysenate.gov; simonj@nyassembly.gov; slevin@council.nyc.gov; Dana Runnells (danarun@gmail.com)  
**Subject:** 80 Flatbush Environmental Impact Assessment

**TO: Lead ECF Agency Contact Person:**

Jennifer Maldonado, Executive Director  
New York City Educational Construction Fund  
30-30 Thompson Avenue, 4th Floor  
Long Island City, New York 11101  
**Email:** [KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)

**Copy to:**

Velmanette Montgomery, State Senator: [montgome@nysenate.gov](mailto:montgome@nysenate.gov)  
Jo Anne Simon, Assembly Member: [simonj@nyassembly.gov](mailto:simonj@nyassembly.gov)  
Stephen Levin, City Council Member: [slevin@council.nyc.gov](mailto:slevin@council.nyc.gov)

**Dear Ms. Maldonado,**

My wife, Dana Runnells Keith, and I, as owners of a condominium in 1 Hanson Place are very concerned about the planned construction at 80 Flatbush. Our concerns include the following:

**Would you kindly clarify the proposed 80 Flatbush neighborhood location?**

- No part of the site of 80 Flatbush is in Downtown Brooklyn
- Boerum Hill border: Schemerhorn & Flatbush
- Fort Greene border: Flatbush to Dekalb
- Downtown Brooklyn starts North of Schemerhorn and West of Flatbush
- The site is NOT in downtown Brooklyn. It is in residential Brownstone Brooklyn, and zoning should reflect that.

**Would you kindly comment on ECF (Education Construction Fund) RFEI public process transparency:**

- The ECF uses tax payer funds to build schools by issuing tax-free bonds backed by the credit of the City of NY.
- The ECF put out a bid for developers to partner with on the project of rebuilding the Khalil Gibran High School.
- What transparency was provided on this public RFEI process?:
  - o What was the public RFEI process?
  - o Where is the original RFEI document?
  - o When did the process occur?
  - o How were competitive bids sourced?
  - o Who were the other bidders?
  - o Who was on the review committee?
  - o What were the criteria for selecting the most qualified developer among all bidders?
  - o Who were the finalists considered?

o None of this appears to be outlined on the ECFs website about the project: <http://schools.nyc.gov/community/facilities/ecf>

- Could you please provide transparency about the use of public funds via ECF:
  - o How much taxpayer dollars will go to fund the school portion of the 80 Flatbush Project?
  - o What will the term of the tax-free bonds be?
  - o If the project goes bankrupt after issuing the bonds, who will be responsible for paying the bond-holders?
  - o In addition to paying for the school, what form of tax abatement or other benefit will be issued for the building?

**We are concerned about Alloy, LLC:**

- What are Alloy LLC’s qualifications to build a project of this scale?
- Their largest project to-date was 1 John Street, a 42-unit boutique condo project in DUMBO: <http://www.alloyllc.com/work/one-john-street>
- How will a 14-person firm complete a project with as many floors as the 1 World Trade Tower? (80 Flatbush proposed 112 total stories + two schools and other surrounding buildings).
- What happens if the project fails or goes bankrupt mid-stream? What is the contingency plan to ensure it won’t be left as an incomplete construction site with no new schools as promised?

**We are concerned about the area of Environmental Impact Assessment:**

- The scoping document proposes an environmental impact assessment area of a 400-foot radius around the site.
- That covers an area bordered by:
  - North: Livingston & Flatbush
  - o South: Atlantic & 4th Ave.
  - o East: One Hanson Place (Just short of St. Felix St.)
  - o West: State (bet. 3rd – Nevins)
- Would you extend impact area to 1-mile radius (5,280 ft.) please?

**We have the following 80 Flatbush school concerns:**

- Negative impact on school overcrowding
  - o DOE / SCA formula for projecting public school students:  
<http://www.nycsca.org/Community/Capital-Plan-Reports-Data#Housing-Projections-70>
  - o Every 100 units of residential housing will yield 55 public school students:
    - o The 922 proposed residential units of 80 Flatbush will bring 507 new students.
    - o The new 350-seat elementary school will be a net negative of 157 seats (the new Khalil Gibran H.S. is just a replacement for existing seats)
    - o By NYC DOE math, the school aspect of the project will contribute to local overcrowding, **not alleviate it.**
    - o Local zoned public schools including P.S. 38, P.S. 261, P.S. 133 are already at or well over 100% capacity.
- Noise impact on learning:

- o Research shows noise (such as construction noise) can have a severe adverse impact on students' ability to learn.
- o The plan calls for keeping the KG H.S. open for the entire project and keeping the new elementary school open during construction of phase 2.
- o <http://www.thirteen.org/metrofocus/2012/08/gauging-the-impact-of-noise-on-childrens-learning/>
- Traffic danger for students:
- o Having 350 students enter / leave a high school on Flatbush Avenue daily is dangerous to the students.

**We have the following zoning exceptions requests:**

- FAR increase
    - o FAR increase request from 6 to 18 is 3x what it is zoned for.
    - o This will allow 112 stories to be build on the site vs. approx. 34
    - o If Alloy does not receive the FAR exception, they have said they will not build the school.
    - o Changing site zoning from C6-2 to C6-6 is unprecedented and unjustified. As noted above, this site is not in Downtown Brooklyn and no area of Downtown Brooklyn is zoned above C6-4.
  - Setback requirement removal
    - o Project is requesting an exception ignore any setback zoning requirements.
- This would allow the 38-story phase-1 tower to build straight up from the street with no setback.
- o This will block light from all surrounding areas in all directions.

**Safety / Traffic congestion / public transportation / pedestrian safety**

- The 80 Flatbush Ave development site is located at one of the busiest crossroads in New York City. 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
- The addition of a loading dock on State Street near a public school entrance and the tower's residential entrance will compromise pedestrian safety.
- 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?
- Area traffic and public transportation are already congested, especially during events at the Barclay's Center. How will this project avoid making these issues untenable?
- Concerns about a large glass skyscraper that blocks both the low rise brownstone area and the views of OHP from the surrounding neighborhood.
- Concerns about construction dust and soil contaminants that can be disrupted over an 8-year construction project.
- Such massive structures change the complexion of the neighborhood with no real coordinated approach at neighborhood and city planning.

**Glare / Wind / Shadow impacts**

- Structures of this size can have a substantial impact on the aerodynamics of an area. The corner of Flatbush and Hanson Place is already one of the windiest corners in Brooklyn and has been made more so with the addition of 300 Ashland and The Hub.

The impact study needs to include an assessment of the potential impact of the change in wind patterns and potential impact on the surrounding neighborhood.

- Similarly, glare from glass towers affect light, heating, cooling etc. of nearby residences.
- The need for the expansion of the impact radius is necessary to fully address the potential impact of shadow, wind, and glare from a nearly 1,000 foot structure.

### **Public Green Space**

- The neighborhood's limited green spaces are already congested and overused.
- Why is this project not offering any additional public space or green space like the public plaza recently opened at 300 Ashland?

### **Construction hours / noise / pollution / duration / vibrations / damage impact:**

- During what hours / days of the week will construction take place?
- If the goal is to keep the Khalil Ghibran school open during the entire project, will that push construction hours to nights and weekends, further disrupting the residential neighborhoods?
- What steps is Alloy planning to take to mitigate construction noise, dust and other pollution that may be harmful to students, residents, tourists, etc.
- If the construction unearths lead, asbestos or other toxic substances in the demolition of buildings from the 1860s, what steps will Alloy take to notify the public and remediate?
- What is Alloy going to do to minimize the impact on the community of this project during an 8-year construction timeline? What compensation will be given to the neighborhood if the project goes over the projected timeline or fails in the middle?
- What measures will be taken to ensure the construction of such a largescale project in a residential neighborhood does not inflict damage on the historic brownstones on State Street as well as the the landmarked Williamsburgh Savings Bank tower across the street? If damage is incurred, what compensation is Alloy prepared to offer area residents?

### **As of Right design:**

- What would an as of right building look like? (i.e. using the zoning the lots have the right to build without the zoning exceptions they are seeking)
- Alloy and the ECF have not provided a design of what they would build with no zoning exceptions.
- Why is Alloy not offering to include schools, the ECF and cultural space in the project if they do not obtain the zoning exceptions they are requesting?

Thank you very much for your kind assistance on this matter.

Best regards,

**Barker C. Keith**  
Owner of Apartment 18G.

1 Hanson Place #18G  
Brooklyn, NY 11243  
M +1.646.662.4264

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**From:** Patricia Kelley <patricia@kelleydesignbrooklyn.com>  
**Sent:** Friday, July 28, 2017 3:38 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** Alloy Development at 80 Flatbush in Boerum Hill

Jennifer Maldonado, Executive Director  
New York City Educational Construction Fund  
30-30 Thompson Avenue 4<sup>th</sup> Floor  
Long Island City, NY 11101

Re: Alloy Development site at 80 Flatbush Avenue in Boerum Hill

Dear Ms. Maldonado,

I am writing you as a concerned neighbor regarding the proposed development of two towers at State and Schermerhorn Streets. I have been a homeowner in Boerum Hill for almost twenty years. The request for a zoning variance to FAR 18 for the Alloy project must be denied. There is no reason, or neighborhood need, educational or cultural, that warrants the construction of a 74 story tower in this location. A location that abuts brownstone blocks and is adjacent to the Boerum Hill Historic District. The only explanation for the construction of such a tower is developer greed. In addition, an EIS study of the impact of development at this location should be done for a minimum ½ mile radius.

There are other locations in Boerum Hill that could house a relocated, and upgraded Khahil Gibran facility without granting a developer the right to build such a tall tower. A new high-rise building that will be totally out of context and scale with the neighboring community. The current proposal is a Faustian bargain with Alloy Development and it is the community that will pay the price. This is the type of development that threatens the very nature that makes Brooklyn so popular and distinct from Manhattan.

Regards,

Patricia Kelley  
433 Pacific Street  
Brooklyn NY 11217

---

**From:** Jennifer Kellogg <bkbondstreet@gmail.com>  
**Sent:** Monday, July 10, 2017 8:15 AM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** No large development

Hello,

I'm writing on behalf of the community of downtown Brooklyn to plead the case of NOT overdeveloping the area.

Please, keep population and traffic under control by refrain from building a structure the neighborhood cannot support.

Thank you,  
Jennifer  
65 Bond Street  
--  
Jennifer Kellogg  
RHKS65, LLC  
917.972.1878

From: Angela Khermouch [mailto:[akhermouch2626@gmail.com](mailto:akhermouch2626@gmail.com)]  
Sent: Thursday, June 29, 2017 2:43 PM  
To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>  
Subject: 80 Flatbush Scoping Comments

Hi,

I am a resident of 518 State Street, across State Street from the proposed 80 Flatbush project and would like to add comments to the Environmental Impact scope.

Many of the buildings across the street and on other streets nearby, including my own, are civil war era buildings, meaning their structure is significantly old. My own building has a wood structure that likely cannot withstand large vibrations coming from nearby construction. Any blasting or the installation of piles for foundations, which I imagine will be necessary for this skyscraper of a building, would have a significant negative impact on the structure of the surrounding buildings. I would like the impact of this development's construction on the structure of the surrounding buildings, particularly those that have civil war era wood structures, to be thoroughly studied.

I also noticed there are no renderings of the 80 Flatbush proposal from state Street. This leads me to believe that the scale of this building will be wholly out of scale with those buildings across State Street which are mostly 3-4 story brownstone or brick buildings. Renderings and other drawings of the proposal from a pedestrian's point of view looking down state Street toward Atlantic terminal and up at the tower from state street should be requested/produced to better understand the massive scale difference between the proposed tower and existing neighborhood just across the street.

Lastly, the study should consider the other streets and neighborhoods that exist in the city with this zoning. A comparison of this neighborhood to other C6-6 districts should be made to understand this addition's destruction to the rest of the neighborhood's character. The study of the existing neighborhood in question should include neighboring streets in all directions for at least 1/4 mile.

Please consider the above comments when preparing the Environmental Impact scope.

Overall, it is my opinion that the request for this zoning variance should be denied based on the proposal's out-of-scale design that does not just negatively impact and dwarf it's neighbors across the street, but the entire Boreum Hill neighborhood as a whole. The zoning should remain as C6-2.

Thank you,  
Angela Khermouch  
Resident of 518 state street

----- Forwarded message -----

From: Angela Kim <[angela.y.kim@gmail.com](mailto:angela.y.kim@gmail.com)>

To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>

Cc: "[rbearak@brooklynbp.nyc.gov](mailto:rbearak@brooklynbp.nyc.gov)" <[rbearak@brooklynbp.nyc.gov](mailto:rbearak@brooklynbp.nyc.gov)>, "[montgome@nysenate.gov](mailto:montgome@nysenate.gov)" <[montgome@nysenate.gov](mailto:montgome@nysenate.gov)>, "[simonj@nyassembly.gov](mailto:simonj@nyassembly.gov)" <[simonj@nyassembly.gov](mailto:simonj@nyassembly.gov)>, "[slevin@council.nyc.gov](mailto:slevin@council.nyc.gov)" <[slevin@council.nyc.gov](mailto:slevin@council.nyc.gov)>

Bcc:

Date: Mon, 24 Jul 2017 16:26:18 +0000

Subject: 80 Flatbush Project Concerns

Dear all,

I am an owner and resident of 1 Hanson Place and am writing to you in regards to the 80 Flatbush project. I attended the meeting on Wed June 28 and have grave concerns about this project.

This neighborhood is one where I plan to raise my family as I have fallen deeply in love with it during the past 2 years of owning and residing here. Cities and neighborhoods will always evolve and I embrace this change, but my concern is that 80 Flatbush does not fit in with the scale nor the sensibility of the neighborhood whatsoever, and will only negatively impact the area moving forward.

The proposed construction does not appear to respect the neighborhood in many ways. The zoning exceptions that Alloy is requesting confirm this. For example, the setback exception that they are requesting be eliminated is in place to allow light to reach the street and the neighborhood. These exist to serve the community at large but they are specifically requesting that this not apply to their project despite the fact that they are also requesting a height exception with a FAR increase of 3x.

Not only does 80 Flatbush not preserve the sight lines of the landmarked Williamsburgh Savings Bank building (an anchor within our community), but it also does not seem like the developers are taking into consideration

designing at a scale and density that is in line with the neighborhood unlike Two Trees, which developed 300 Ashland.

In addition, Alloy does not have the experience to be building towers of this size and nature. It isn't even close. Their portfolio consists of smaller condo buildings. I am terrified that Alloy will break ground on a project that will take many years to complete with countless delays, if it is in fact, completed at all.

Their offer to build additional schools as a way of compromise only suffices at the public relations level because if you look deeper, their plan will only exacerbate the overcrowding of schools. The addition of 922 new residential units will add 510 new students. Adding 370 new seats is a net negative. This number is significant. This will not attract young families to the neighborhood and it will also prevent young families like ours from establishing roots.

In summary, I hope that I've been able to express to you some of my grave concerns about the 80 Flatbush. Thank you for reading my comments and I am more than happy to further clarify if it would be helpful in any way.

Best,  
Angela Kim

556 State Street, Apt. 1A  
Brooklyn, New York 11217  
July 2, 2017

Ms. Jennifer Maldonado, Executive Director  
NYC Educational Construction Fund  
30-30 Thompson Avenue, 4<sup>th</sup> Floor  
Long Island City, New York 11101

Re: 80 Flatbush Avenue scope of work for the EIS

6 JUL 4 10:07

Dear Ms. Maldonado:

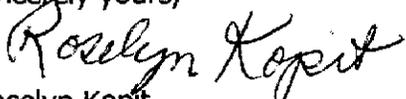
I am a resident on the block of State Street that will directly face this development and it will greatly effect my life in many ways. I have lived on this block for 10 years and in the Boerum Hill neighborhood since 1970. I have seen many changes over that time and I know that most of these changes are an improvement over what the area was so long ago. I don't want to stop change, but I think it should be managed in a thoughtful, respectful way as it impacts its neighbors.

I have many concerns about this project that I feel should be considered in the scoping plan for the Environmental Study:

- The plan should encompass a larger area to be surveyed, a minimum of ¼ mile, but ideally one mile.
- Density and height scale in relationship to brownstone Brooklyn
- Impacts on traffic, water, sewer, public transit, pedestrian safety, noise, air quality, and parking space are all obvious areas of concern
- Shadows, wind tunnels, and reflections should be studied.
- Actual benefits to schools capacity are dubious with 900 new families in just this development.
- Access for fire trucks for Company 226 on State Street
- The effect of trucks, materials, and cranes impacts on the 500 block of State Street and all of Boerum Hill during the long construction process
- Impact on housing prices. Will 900 new units glut the market? Will the 8 year building timetable devalue the residences on our block?

I am sure that many of these issues have been raised before, but I just want to emphasize that the decisions that your group makes will impact my life and the lives of my neighbors and my neighborhood forever.

Sincerely yours,

  
Roselyn Kopit

556 State Street  
Brooklyn, NY 11217 31 JUL PM 5:17  
July 26, 2017

Ms. Jennifer Maldonado, Executive Director  
NYC Educational Construction Fund  
30-30 Thomson Avenue, 4th Floor  
Long Island City, NY 11101

Re: 80 Flatbush Avenue EIS

Dear Ms. Maldonado:

I have been a resident of Boerum Hill for over 40 years, practically as long as this neighborhood was identified as such and for all that time, State Street has been considered within the Boerum Hill boundaries. This proposed behemoth will tower over rest of the low rise neighborhood and is in violation of the transitional zoning and design context. It simply is too tall and too dense.

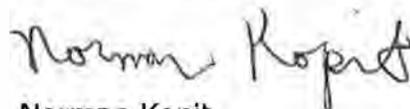
When the Environmental Study is done, a larger context must be considered. There are so many changes nearby, that at least an area of 1/4 mile must be surveyed. Also the study should include drawing and elevations of all buildings over 12 stories within the 1/4 mile area.

In addition, there are many other aspects of the development that should be studied:

- Impacts on existing infrastructure, i.e. water, sewer, subway congestion, parking, etc.
- Impact of wind tunnels, especially in front of 1 Hanson Place
- Impact on traffic flow, already at near standstill.
- Impact on shadows over large swaths of low rise neighborhoods
- Actual deficit of classroom seats, due to explosion of new units in the area.
- Impact on the delivery of safety services, especially in regard to Fire Company 226 on State Street.
- Impacts of construction dangers during a 6 - 8 year build-out, with cranes, airborne pollutants, and noise.

I am not opposed to new schools, mixed income housing, or new residences in the area. They are all worthy goals, but these projects should fit into the context of our existing neighborhood.

Sincerely yours,



Norman Kopit

cc: Councilman Steve Levin

---

**From:** Marc Korashan <sbstee@att.net>  
**Sent:** Thursday, July 27, 2017 7:58 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 FLATBUSH AVE

While the need for new schools is clear and the effort to preserve the historic buildings is commendable, the towers are out of scale with the neighborhood and will undoubtedly impact negatively on traffic (with a resulting negative impact on air quality). Traffic is already slow through the area due to the construction of the Barkley Center. Parking is difficult and has been made more so by the opening of many CitiBike stands that take away spaces. Cars circulating and looking for parking will add to congestion and exhaust. The MTA has made no plans to increase service along the Fourth Ave corridor where many high rise buildings are already going up. The addition of another high rise here will further exacerbate crowding on subways and buses serving the area.

The size of the residential towers should be changed to make the project more suitable for this neighborhood.

Marc Korashan

Lucy Koteen  
138 Lafayette Ave  
Brooklyn, NY 11238

June 28, 2017

As we look around Brooklyn now, particularly in Fort Greene, Boerum Hill, Downtown Brooklyn, Prospect Heights we see many highrises being constructed and many new ones completed. There are thousands of new residents moving onto these high rises. As we know, subways have become overcrowded, and are breaking down. Aging infrastructures need to be evaluated as to their ability to sustain this rapid growth. Combined sewage overflow is a serious problem in downstream Gowanus. The Scope of Work must encompass the whole area from the Brooklyn Bridge Park to Pacific Park not only for infrastructure sustainability but as to whether the many units newly created will find the population to fill them. An inadequate 400 foot radius does not encompass the impact of the many new buildings and accompanying congestion. It is essential that **this** project not be segregated from the combined impacts of all the new developments within a mile radius, not 400 feet. The area must be looked at as an integrated whole.

The landscape and skyline has radically changed to the point where current residents no longer recognize the place they live in and are now assaulted not only by congested streets, noise, dust, but by shadows where once there was sunlight. Homeowners in Fort Greene say that their sunny gardens are engulfed in shadows.

It is stated that "If the EIS identifies any significant impacts for which no mitigation can be implemented, they will be presented as unavoidable adverse impacts." We are stuck with it.

In addition how much in taxes will the developer **not** pay into the general funds that run the city over the lifetime of the lease. The developer will speak about what they are building in the way of schools but how much are they not contributing to the City general coffers that pay for everything else we all use. This is tax money, if collected would pay for new schools and all the other needs of a city. When they don't pay the rest of the population has to cover their share of general costs from increased taxes. We need a full side by side analysis.

The City should not be shunting its responsibility to create new schools as the population grows, off to private developers whose motivation is, after all, profit, not altruism.

The buildings should be limited to the lowest possible height allowed by as of right development. We don't need more towers overshadowing our communities and clogging our streets. Let them pay their taxes and let the City build our schools. We see a push back all over the city where residents are saying enough is enough as they lose their neighborhoods to towers and gentrification and the local shops are pushed out by high rents.

I recommend the "no action" plan.

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.

From: yukari coco model <yukaricocomodel@gmail.com>  
To: coco model <cocomodel@gmail.com>  
Cc: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>, "montgome@nysenate.gov" <montgome@nysenate.gov>, "simonj@nyassembly.gov" <simonj@nyassembly.gov>, "slevin@council.nyc.gov" <slevin@council.nyc.gov>  
Bcc:  
Date: Tue, 11 Jul 2017 03:48:23 +0000  
Subject: 80 Flatbush Environmental Impact Assessment Scoping Document

Dear Ms. Maldonado,  
New York City Educational Construction Fund,  
State Senator Montgomery,  
Assembly Member Simon,  
City Council Member Levin,

I am writing to share my concerns below regarding the draft scoping document for the Environmental Impact Assessment for the 80 Flatbush Project.

Neighborhood Setting:

80 Flatbush is in a residential brownstone Brooklyn neighborhood. It's current designs are totally out of keeping with this brownstone neighborhood. Zoning should reflect the neighborhood.

Transparency of the public RFEI process?

What was the public RFEI process? Where is the original RFEI document? When did the process occur? How were competitive bids sourced? Who were the other bidders? Who was on the review committee? What were the criteria for selecting the most qualified developer among all bidders? Who were the finalists considered?

Transparency re the use of public funds via ECF?

How much taxpayer dollars will go to fund the school portion of the 80 Flatbush Project? What will the term of the tax-free bonds be? If the project goes bankrupt after issuing the bonds, who will be responsible for paying the bond-holders? In addition to paying for the school, what form of tax abatement or other benefit will be issued for the building?

Alloy, LLC:

What are Alloy LLC's qualifications to build a project of this scale? How will a 14-person firm complete a project with as many floors as the 1 World Trade Tower? What happens if the project fails or goes bankrupt mid-stream? What is the contingency plan to ensure it won't be left as an incomplete construction site with no new schools as promised?

Area of Environmental Impact Assessment:

I request an extended impact area of at least 1-mile radius.

Negative impact on school overcrowding

By NYC DOE math, every 100 units of residential housing will yield 55 public school students: The 922 proposed residential units of 80 Flatbush will bring 507 new students. The new 350-seat elementary school will be a net negative of 157 seats (the new Khalil Gibran H.S. is just a replacement for existing seats) By NYC DOE math, the school aspect of the project will contribute to local overcrowding, not alleviate it.

### Zoning Exceptions :

FAR increase request from 6 to 18 is 3x what it is zoned for. If Alloy does not receive the FAR exception, they have said they will not build the school. Changing site zoning from C6-2 to C6-6 is unprecedented and unjustified. Project is requesting an exception ignore any setback zoning requirements. This would allow the 38-story phase-1 tower to build straight up from the street with no setback. This will block light from all surrounding areas in all directions.

### Project Size/Density

A glass skyscraper the size of the Chrysler building will dramatically change the fabric of the residential neighborhood and surrounding area of Brownstone Brooklyn. This project does not respect the surrounding neighborhood. The two towers will block the site lines of the Landmarked Williamsburgh Savings Bank Tower from most western neighborhoods, including Manhattan and the Harbor.

### Safety / Traffic congestion / public transportation / pedestrian safety

The 80 Flatbush Ave development site is located at one of the busiest crossroads in New York City. 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 • The addition of a loading dock on State Street near a public school entrance and the tower's residential entrance will compromise pedestrian safety. • 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? Area traffic and public transportation are already congested, especially during events at the Barclay's Center. How will this project avoid making these issues untenable? Such massive structures change the complexion of the neighborhood with no real coordinated approach at neighborhood and city planning.

### Glare / Wind / Shadow Impacts

Structures of this size can have a substantial impact on the aerodynamics of an area. The corner of Flatbush and Hanson Place is already one of the windiest corners in Brooklyn and has been made more so with the addition of 300 Ashland and The Hub. •The impact study needs to include an assessment of the potential impact of the change in wind patterns and potential impact on the surrounding neighborhood. Similarly, glare from glass towers affect light, heating, cooling etc. of nearby residences. The need for the expansion of the impact radius is necessary to fully address the potential impact of shadow, wind, and glare from a nearly 1,000 foot structure.

### Public Green Space

The neighborhood's limited green spaces are already congested and overused. Why is this project not offering any additional public space or green space like the public plaza recently opened at 300 Ashland?

### Construction hours / noise / pollution / duration / vibrations / damage impact:

During what hours / days of the week will construction take place? If the goal is to keep the Khalil Ghibran school open during the entire project, will that push construction hours to nights and weekends, further disrupting the residential neighborhoods? What steps is Alloy planning to take to mitigate construction noise, dust and other pollution that may be harmful to students, residents, tourists, etc. If the construction unearths lead, asbestos or other toxic substances in the demolition of buildings from the 1860s, what steps will Alloy take to notify the public and

remediate? What is Alloy going to do to minimize the impact on the community of this project during an 8-year construction timeline? What compensation will be given to the neighborhood if the project goes over the projected timeline or fails in the middle? What measures will be taken to ensure the construction of such a largescale project in a residential neighborhood does not inflict damage on the historic brownstones on State Street as well as the the landmarked Williamsburgh Savings Bank tower across the street? If damage is incurred, what compensation is Alloy prepared to offer area residents?

As of Right Design:

What would an as of right building look like? Alloy and the ECF have not provided a design of what they would build with no zoning exceptions. Why is Alloy not offering to include schools, the ECF and cultural space in the project if they do not obtain the zoning exceptions they are requesting?

Thank you for considering my comments,

Respectfully,  
Yukari Koyama

----- Forwarded message -----

From: Phillis Lehmer <ptlnyc@gmail.com>

To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>

Cc:

Bcc:

Date: Thu, 6 Jul 2017 02:25:24 +0000

Subject: 80 Flatbush concerns

Hello Jennifer,

We need a Study Area of one-half mile not the 400 feet in the proposal. This will affect the studies of traffic, noise, water and sewer load, air quality and other quality of life issues.

Traffic is already awful. The subway is overcrowded. I've been hit twice by speeding cars down State Street.

How many school age children will result from 900 units of housing? How will the city address the current seating deficit?

Please do not just say yes to a project that effects so many people.

Thanks  
Phillis Lehmer

----- Forwarded message -----

From: Phillis Lehmer <[ptlnyc@gmail.com](mailto:ptlnyc@gmail.com)>

To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>

Cc:

Bcc:

Date: Thu, 27 Jul 2017 15:12:06 +0000

Subject: 80 Flatbush concerns

- I'm very concerned about the following:
- 
- This development is located in Boerum Hill not downtown, therefore, the density **is excessive.**
- Locating the tallest tower in Brooklyn next to low-rise residential buildings is a violation of transitional zoning and design context.
- The study area of 400-feet is inadequate to study all the indirect impacts, therefore a half-mile radius is needed.
- For a more accurate and informed study, the EIS should include drawings and elevations of the No Action plan as well as a comparison elevation of heights of all buildings over 12-stories in the study area.
- The development does not include any open space for the community. While green space is shown on the roofs of the schools, they are small and may not be accessible to the public.

I live on State Street. THIS IS TOO MUCH!!!!

Phillis Lehmer

From: Mariel Liebman <marielliebman@gmail.com>  
To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>  
Cc: "montgome@nysenate.gov" <montgome@nysenate.gov>, "simonj@nyassembly.gov" <simonj@nyassembly.gov>, "slevin@council.nyc.gov" <slevin@council.nyc.gov>  
Bcc:

Date: Mon, 10 Jul 2017 20:19:25 +0000

Subject: Environmental Impact Statement (EIS) scoping document for the 80 Flatbush Project  
80 Flatbush neighborhood location clarification:

- No part of the site of 80 Flatbush is in Downtown Brooklyn
- Boerum Hill border: Schemerhorn & Flatbush
- Fort Greene border: Flatbush to Dekalb
- Downtown Brooklyn starts North of Schemerhorn and West of Flatbush
- The site is NOT in downtown Brooklyn. It is in residential Brownstone Brooklyn, and zoning should reflect that.

ECF (Education Construction Fund) RFEI public process transparency:

- The ECF uses tax payer funds to build schools by issuing tax-free bonds backed by the credit of the City of NY.
- The ECF put out a bid for developers to partner with on the project of rebuilding the Khalil Gibran High School.
- What transparency was provided on this public RFEI process?:
  - o What was the public RFEI process?
  - o Where is the original RFEI document?
  - o When did the process occur?
  - o How were competitive bids sourced?
  - o Who were the other bidders?
  - o Who was on the review committee?
  - o What were the criteria for selecting the most qualified developer among all bidders?
  - o Who were the finalists considered?
  - o None of this appears to be outlined on the ECFs website about the project:  
<http://schools.nyc.gov/community/facilities/ecf>
- Request for transparency about the use of public funds via ECF:
  - o How much taxpayer dollars will go to fund the school portion of the 80 Flatbush Project?
  - o What will the term of the tax-free bonds be?
  - o If the project goes bankrupt after issuing the bonds, who will be responsible for paying the bond-holders?
  - o In addition to paying for the school, what form of tax abatement or other benefit will be issued for the building?

Comments / Concerns about Alloy, LLC:

- What are Alloy LLC's qualifications to build a project of this scale?
- Their largest project to-date was 1 John Street, a 42-unit boutique condo project in DUMBO:  
<http://www.alloyllc.com/work/one-john-street>
- How will a 14-person firm complete a project with as many floors as the 1 World Trade Tower? (80 Flatbush proposed 112 total stories + two schools and other surrounding buildings).
- What happens if the project fails or goes bankrupt mid-stream? What is the contingency plan to ensure it won't be left as an incomplete construction site with no new schools as promised?

#### Expand Area of Environmental Impact Assessment:

- The scoping document proposes an environmental impact assessment area of a 400-foot radius around the site.
- That covers an area bordered by:
  - o North: Livingston & Flatbush
  - o South: Atlantic & 4th Ave.
  - o East: One Hanson Place (Just short of St. Felix St.)
  - o West: State (bet. 3rd – Nevins)
- Request: extend impact area to 1-mile radius (5,280 ft.)

#### 80 Flatbush school concerns:

- Negative impact on school overcrowding
  - o DOE / SCA formula for projecting public school students:
    - o <http://www.nycsca.org/Community/Capital-Plan-Reports-Data#Housing-Projections-70>
    - o Every 100 units of residential housing will yield 55 public school students:
    - o The 922 proposed residential units of 80 Flatbush will bring 507 new students.
    - o The new 350-seat elementary school will be a net negative of 157 seats (the new Khalil Gibran H.S. is just a replacement for existing seats)
    - o By NYC DOE math, the school aspect of the project will contribute to local overcrowding, not alleviate it.
    - o Local zoned public schools including P.S. 38, P.S. 261, P.S. 133 are already at or well over 100% capacity.
  - Noise impact on learning:
    - o Research shows noise (such as construction noise) can have a severe adverse impact on students' ability to learn.
    - o The plan calls for keeping the KG H.S. open for the entire project and keeping the new elementary school open during construction of phase 2.
    - o <http://www.thirteen.org/metrofocus/2012/08/gauging-the-impact-of-noise-on-childrens-learning/>
  - Traffic danger for students:
    - o Having 350 students enter / leave a high school on Flatbush Avenue daily is dangerous to the students.

#### Zoning exceptions requests:

- FAR increase
  - o FAR increase request from 6 to 18 is 3x what it is zoned for.
  - o This will allow 112 stories to be build on the site vs. approx. 34
  - o If Alloy does not receive the FAR exception, they have said they will not build the school.
  - o Changing site zoning from C6-2 to C6-6 is unprecedented and unjustified. As noted above, this site is not in Downtown Brooklyn and no area of Downtown Brooklyn is zoned above C6-4.
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  - o Project is requesting an exception ignore any setback zoning requirements.
  - o This would allow the 38-story phase-1 tower to build straight up from the street with no setback.
  - o This will block light from all surrounding areas in all directions.

#### Project Size / density concerns:

- Requested FAR increase from 6 to 18 is 3x what is zoned for this residential neighborhood.

- A glass skyscraper the size of the Chrysler building will dramatically change the fabric of the residential neighborhood and surrounding area of Brownstone Brooklyn.
- This project does not respect the surrounding neighborhood.
- The two towers will block the site lines of the Landmarked Williamsburgh Savings Bank Tower from most western neighborhoods, including Manhattan and the Harbor.

#### Safety / Traffic congestion / public transportation / pedestrian safety

- The 80 Flatbush Ave development site is located at one of the busiest crossroads in New York City. 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
- The addition of a loading dock on State Street near a public school entrance and the tower's residential entrance will compromise pedestrian safety.
- 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?
- Area traffic and public transportation are already congested, especially during events at the Barclay's Center. How will this project avoid making these issues untenable?
- Concerns about a large glass skyscraper that blocks both the low rise brownstone area and the views of OHP from the surrounding neighborhood.
- Concerns about construction dust and soil contaminants that can be disrupted over an 8-year construction project.
- Such massive structures change the complexion of the neighborhood with no real coordinated approach at neighborhood and city planning.

#### Glare / Wind / Shadow impacts

- Structures of this size can have a substantial impact on the aerodynamics of an area. The corner of Flatbush and Hanson Place is already one of the windiest corners in Brooklyn and has been made more so with the addition of 300 Ashland and The Hub.
- The impact study needs to include an assessment of the potential impact of the change in wind patterns and potential impact on the surrounding neighborhood.
- Similarly, glare from glass towers affect light, heating, cooling etc. of nearby residences.
- The need for the expansion of the impact radius is necessary to fully address the potential impact of shadow, wind, and glare from a nearly 1,000 foot structure.

#### Public Green Space

- The neighborhood's limited green spaces are already congested and overused.
- Why is this project not offering any additional public space or green space like the public plaza recently opened at 300 Ashland?

#### Construction hours / noise / pollution / duration / vibrations / damage impact:

- During what hours / days of the week will construction take place?
- If the goal is to keep the Khalil Ghibran school open during the entire project, will that push construction hours to nights and weekends, further disrupting the residential neighborhoods?
- What steps is Alloy planning to take to mitigate construction noise, dust and other pollution that may be harmful to students, residents, tourists, etc.
- If the construction unearths lead, asbestos or other toxic substances in the demolition of buildings from the 1860s, what steps will Alloy take to notify the public and remediate?

- What is Alloy going to do to minimize the impact on the community of this project during an 8-year construction timeline? What compensation will be given to the neighborhood if the project goes over the projected timeline or fails in the middle?
- What measures will be taken to ensure the construction of such a large-scale project in a residential neighborhood does not inflict damage on the historic brownstones on State Street as well as the the landmarked Williamsburgh Savings Bank tower across the street? If damage is incurred, what compensation is Alloy prepared to offer area residents?

As of Right design:

- What would an as of right building look like? (i.e. using the zoning the lots have the right to build without the zoning exceptions they are seeking)
- Alloy and the ECF have not provided a design of what they would build with no zoning exceptions.
- Why is Alloy not offering to include schools, the ECF and cultural space in the project if they do not obtain the zoning exceptions they are requesting?

Sent from my iPhone

From: Gustavo Lovato <guslov@mac.com>  
To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>  
Cc: "montgome@nysenate.gov" <montgome@nysenate.gov>, "simonj@nyassembly.gov" <simonj@nyassembly.gov>, "slevin@council.nyc.gov" <slevin@council.nyc.gov>  
Bcc:  
Date: Mon, 10 Jul 2017 19:33:24 +0000  
Subject: 80 Flatbush Project  
To the ECF:

I am an owner of a unit at One Hanson Place and I am deeply concerned about the suggested project at 80 Flatbush Avenue.

From a personal perspective, I am extremely concerned about what several years of construction right across the avenue from a Historic Landmark building will create in terms of vibrations, dust, noise, traffic jams, home value, privacy, and obscured views.

From a more global perspective, I also very concerned about all these points that at this juncture lack transparency:

80 Flatbush neighborhood location clarification:

No part of the site of 80 Flatbush is in Downtown Brooklyn

Boerum Hill border: Schemerhorn & Flatbush

Fort Greene border: Flatbush to Dekalb

Downtown Brooklyn starts North of Schemerhorn and West of Flatbush

The site is NOT in downtown Brooklyn. It is in residential Brownstone

Brooklyn, and zoning should reflect that.

ECF (Education Construction Fund) RFEI public process transparency:

The ECF uses tax payer funds to build schools by issuing tax-free bonds backed by the credit of the City of NY.

The ECF put out a bid for developers to partner with on the project of rebuilding the Khalil Gibran High School.

What transparency was provided on this public RFEI process?:

- o What was the public RFEI process?
- o Where is the original RFEI document?
- o When did the process occur?
- o How were competitive bids sourced?

- o Who were the other bidders?
- o Who was on the review committee?
- o What were the criteria for selecting the most qualified developer

among all bidders?

- o Who were the finalists considered?
- o None of this appears to be outlined on the ECFs website about the

project: <http://schools.nyc.gov/community/facilities/ecf>

- Request for transparency about the use of public funds via ECF:

- o How much taxpayer dollars will go to fund the school portion of the 80 Flatbush Project?

- o What will the term of the tax-free bonds be?

- o If the project goes bankrupt after issuing the bonds, who will be

responsible for paying the bond-holders?

- o In addition to paying for the school, what form of tax abatement or

other benefit will be issued for the building?

Comments / Concerns about Alloy, LLC:

What are Alloy LLC's qualifications to build a project of this scale?

Their largest project to-date was 1 John Street, a 42-unit boutique condo

project in DUMBO: <http://www.alloyllc.com/work/one-john-street>

How will a 14-person firm complete a project with as many floors as the 1

World Trade Tower? (80 Flatbush proposed 112 total stories + two

schools and other surrounding buildings).

What happens if the project fails or goes bankrupt mid-stream? What is

the contingency plan to ensure it won't be left as an incomplete construction site with no new schools as promised?

page2image24888

Expand Area of Environmental Impact Assessment:

The scoping document proposes an environmental impact assessment area of a 400-foot radius around the site.

That covers an area bordered by:

- o North: Livingston & Flatbush
- o South: Atlantic & 4th Ave.
- o East: One Hanson Place (Just short of St. Felix St.) o West: State (bet. 3rd – Nevins)

- Request: extend impact area to 1-mile radius (5,280 ft.)

page3image2912 page3image3072 page3image3232 page3image3392  
80 Flatbush school concerns:

- Negative impact on school overcrowding

o DOE / SCA formula for projecting public school students: o  
[http://www.nysca.org/Community/Capital-Plan-Reports-](http://www.nysca.org/Community/Capital-Plan-Reports-Data#Housing-Projections-70)

[Data#Housing-Projections-70](http://www.nysca.org/Community/Capital-Plan-Reports-Data#Housing-Projections-70)

- o Every 100 units of residential housing will yield 55 public school students:
- o The 922 proposed residential units of 80 Flatbush will bring 507 new students.
- o The new 350-seat elementary school will be a net negative of 157 seats (the new Khalil Gibran H.S. is just a replacement for existing seats)
- o By NYC DOE math, the school aspect of the project will contribute to local overcrowding, not alleviate it.
- o Local zoned public schools including P.S. 38, P.S. 261, P.S. 133 are already at or well over 100% capacity.

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- Noise impact on learning:

o Research shows noise (such as construction noise) can have a severe adverse impact on students' ability to learn.

o The plan calls for keeping the KG H.S. open for the entire project and keeping the new elementary school open during construction of phase 2.

o <http://www.thirteen.org/metrofocus/2012/08/gauging-the-impact-of-noise-on-childrens-learning/>

- Traffic danger for students:

o Having 350 students enter / leave a high school on Flatbush Avenue daily is dangerous to the students.

Zoning exceptions requests:

- FAR increase
  - o FAR increase request from 6 to 18 is 3x what it is zoned for.
  - o This will allow 112 stories to be build on the site vs. approx. 34
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not build the school.

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unjustified. As noted above, this site is not in Downtown Brooklyn

and no area of Downtown Brooklyn is zoned above C6-4. • Setback requirement removal

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Area traffic and public transportation are already congested, especially during events at the Barclay's Center. How will this project avoid making these issues untenable?

Concerns about a large glass skyscraper that blocks both the low rise brownstone area and the views of OHP from the surrounding neighborhood.

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Similarly, glare from glass towers affect light, heating, cooling etc. of nearby residences.

The need for the expansion of the impact radius is necessary to fully address the potential impact of shadow, wind, and glare from a nearly 1,000 foot structure.

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Why is this project not offering any additional public space or green space like the public plaza recently opened at 300 Ashland?

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Alloy and the ECF have not provided a design of what they would build with no zoning exceptions.

Why is Alloy not offering to include schools, the ECF and cultural space in the project if they do not obtain the zoning exceptions they are requesting?

I urge you to please consider all these points.

Sincerely,

Gustavo Lovato.

[www.gustavolovato.com](http://www.gustavolovato.com)

[www.gustavolovato.com](http://www.gustavolovato.com)

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**From:** Max Mandel <maxmandel@gmail.com>  
**Sent:** Thursday, July 27, 2017 10:48 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** Gentrification

Hello,

I've watched my neighborhood become ruined by the Manhattanification of Flatbush. Please stop this building from happening. The area is already overwhelmed with people and has become unaffordable for the long time residents.

Yours,

Max Mandel  
73 6th Avenue

From: Paul Marcian <marcianpd@gmail.com>  
To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>  
Cc: "montgome@nysenate.gov" <montgome@nysenate.gov>, "simonj@nyassembly.gov" <simonj@nyassembly.gov>, "slevin@council.nyc.gov" <slevin@council.nyc.gov>, Aashima Chandiok <aashimachandiok@gmail.com>  
Bcc:  
Date: Tue, 11 Jul 2017 01:19:54 +0000  
Subject: 80 Flatbush Environmental Impact Assessment Comments  
All, please see our 80 Flatbush Environmental Impact Assessment Comments attached.

Best,  
Paul and Aashima Marcian

Paul and Aashima Marcian  
One Hanson Place, Apartment 18H  
Brooklyn, NY 11201

Dear Jennifer,

Please see our comments re: 80 Flatbush Project below:

#### Brief summary

- We are highly concerned about the zoning of the location of the building – this proposal would put a skyscraper in the middle of a brownstone neighborhood in Brooklyn
- We note a lack of transparency provided in the public RFEI process
- The scoping document proposes an environmental impact assessment area of a 400-foot radius around the site, we request that this be increased to a 1-mile radius
- We are concerned about the impact of the building on school crowding, noise impact on learning, and traffic impact on student safety
- The setback exception will block light from all surrounding areas in all directions
- Project Size / density concerns – the project does not respect the character of the surrounding neighborhood
- Environmental concerns
  - Impact on traffic / pedestrian safety
  - Lack of public green space
  - Construction hours / noise / pollution / duration / vibrations / damage impacts

#### Comments

- 80 Flatbush neighborhood location clarification - The site is NOT in downtown Brooklyn. It is in residential Brownstone Brooklyn, and zoning should reflect that
  - No part of the site of 80 Flatbush is in Downtown Brooklyn
  - Boerum Hill border: Schemerhorn & Flatbush
  - Fort Greene border: Flatbush to Dekalb
  - Downtown Brooklyn starts North of Schemerhorn and West of Flatbush
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  - What are Alloy LLC's qualifications to build a project of this scale?
  - Their largest project to-date was 1 John Street, a 42-unit boutique condo project in DUMBO: <http://www.alloyllc.com/work/one-john-street>
  - How will a 14-person firm complete a project with as many floors as the 1 World Trade Tower? (80 Flatbush proposed 112 total stories + two schools and other surrounding buildings)
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  - Why is Alloy not offering to include schools, the ECF and cultural space in the project if they do not obtain the zoning exceptions they are requesting?

Best,

Paul and Aashima Marcian

---

**From:** Catie Marshall <catiemarshall23@gmail.com>  
**Sent:** Monday, July 10, 2017 2:45 PM  
**To:** Khalil Gibran 80 Flatbush  
**Cc:** Howard Kolins; Nelson Bakerman; Morgan Bakerman; Ian Bakerman  
**Subject:** PUBLIC COMMENT ON 80 Flatbush Scoping Document

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](mailto:KhalilGibran80Flatbush@schools.nyc.gov)

Dear Ms. Maldonado:

I appreciate this opportunity to comment.

Diving right in, I find it curious that the elevations used to illustrate the look and aspect of the proposed 80 Flatbush development show nothing of the massive amount of new development surrounding and even across the street from the site. This was a neighborhood and is now an urban center ready to collapse in on itself. Make no mistake - this building will have an impact. It is simply too large.

Neighborhood character is of utmost importance -- as are services for those who already live here.

My specific questions:

**Study area:** In the face of bricks and mortar reality, a 400-foot radius is ridiculously small and akin to spot zoning. There is no context. Please provide a realistic map of completed, in construction and contemplated developments **within at LEAST one-half mile** of 80 Flatbush. Include zoning (whether as of right or amended) overlays, projected bulk, population served, and use. Do all required CEQR and SEQRA analyses for the entire area (see comment below). Don't forget the massive office tower coming to the Modell's and PC Richard's site courtesy of Forest City NY. There are four new hotels on Schermerhorn, more than five large residential buildings (including the 56-story HUB) and not including those on Atlantic Avenue. In this context, you can understand why a community that would welcome new schools would be up in arms over another behemoth-- particularly one that is so large because it is subsidized by the School Construction Authority.

**Financial:** Provide evidence that the bulk is necessary to support the building financially without providing extravagant benefit to the builders (everyone knows that you need a 15% cushion to operate a building - what are they pocketing that could pay for more classroom seats?) Let's see the financials.

With regard to the schools: the developer is building them for the system. How much base rent are they being paid by DOE and how much does that bring in on an annual basis, vis a vis what is needed to offset the cost of the affordable units? Obviously they will be taking advantage of the new Affordable NY tax abatement program and indicate that they will be seeking bonding authority. That is a lot of public subsidy.

Where and how will school buses access the area? Where will they onload and offload? Where will they idle (and how will that be policed)?

Density: Given the density already built and underway in the Downtown Brooklyn Special District, why is something of this size being contemplated without taking into account the real traffic, noise, pollution, and congestion during and after construction?

I live at 482 State Street and have seen the residential buildings going up on all sides of me and my neighbors.

Traffic study area: With regard to traffic: the study area should be extended far beyond the required 400 ft. Traffic congestion on State, Flatbush, Nevins, Schermerhorn, Atlantic, and Livingston is being underestimated. The volume on Third Avenue merging into Schermerhorn and Flatbush governs all of what happens to vehicular traffic on our streets. Please provide a traffic study and recommend calming mechanisms for the one-half mile study area.

The new buildings around us already make quite a bit of noise when it is windy. What steps will be taken to ensure that this is a silent neighbor?

Parking. What happens to the locals? Will 80 Flatbush offer parking for free or at a discount?

Infrastructure: Nevins and State and Third and State are where the DEP starts pumping the Catskills water -- is the system equipped to handle the load that is coming courtesy of 80 Flatbush and all the other new development to the south? Will the developer be required to pay and/or wait for enhancements to the Red Hook WWTP?

Education seats: Uses within the building. Given the fact that nearly all of the new buildings in the area are residential, what is the real need for school seats. Consider reducing the commercial and residential uses and making the schools larger within the envelope of the building. What is the overall effect on the development of increasing the number of classroom seats and decreasing the amount of marketrate space? (taking into account that the bigger the school, the more rent the owner gets)

Open Space: we have one (already shaded) playground. Where are the rest? What is the impact on open space for active and passive recreation for children and for those for whom it is not so easy to get around? What are plans to provide greater recreational opportunity?

There is so much more -- **but of principal importance is the expansion of the study area and taking the legally required hard look at all of the environmental factors.** Anyone who takes a walk around the block would concede that it makes sense to do so given the size of the development area footprint and the bulk of the building that is envisioned.

Sincerely,  
Catie Marshall and family  
482 State Street  
Brooklyn NY 11217

---

**From:** H Mason <masonhannah@gmail.com>  
**Sent:** Monday, July 10, 2017 3:08 PM  
**To:** Khalil Gibran 80 Flatbush  
**Cc:** hkolins@aol.com  
**Subject:** 80 Flatbush -- concerns

To whom it may concern,

As a resident of Boerum Hill I am deeply concerned about the size and scope of the Alloy development in our already over burdened area. It is too big and too close. There are so many concerning elements to this project (nearly everything about it) but I will focus on just two:

Study Area -- it is utterly irresponsible not to expand the environmental impact study area beyond the 400 feet of the project.

The magnitude of this development in such a densely populated area demands more thorough environmental and quality of life studies beyond the couple block radius. For example, any traffic backup at Flatbush and Atlantic avenue will effect traffic all the way down 3rd and 4th avenues, residential side streets in Boerum Hill and Fort Green, and well into Park Slope.

The Boerum Hill area already suffers from quality of life issues because of all the current high rise construction including wind noise from towers, construction and truck traffic, noise pollution, air pollution, closed sidewalks, lack of green open spaces, no parking and constant traffic congestion.

**Please expand the study area to at least of one-half mile from the site.**

Schools -- Has there been any thought to putting the high school entrance on Flatbush Ave, one of the busiest and most congested avenues in Brooklyn. What about the student's safety? What about school buses and drop offs/ pick ups on Flatbush? How will this work as Flatbush is already ridiculously dangerous for pedestrians.

Has there been any study given to whether State Street will be able to physically handle an elementary school entrance complete with additional teacher reserved parking (more parking taken from local residents?), school bus traffic and parking, dropoffs/pick up, pedestrian flow etc?

How does the 350 seat elementary school help the area's current seating deficit on top of the 900 units of proposed Alloy housing?

**More analysis of the proposed changes to the high school and the addition of an elementary school are needed.**

Overall, it's deeply concerning that the Alloy development and it's impact on the immediate neighborhoods has not been looked at from a much wider view -- one that includes not just Alloy's impact on the area, but how Alloy fits in with all the other massive residential and commercial projects in the downtown Brooklyn area.

Thank you,  
Hannah Mason  
Boerum Hill resident

From: Martha McBrayer <marthammcbrayer@gmail.com>  
To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>  
Cc: "montgome@nysenate.gov" <montgome@nysenate.gov>, "sim...@nyassembly.gov" <sim...@nyassembly.gov>, "sle...@council.nyc.gov" <sle...@council.nyc.gov>, Alison Forner <alisonforner@gmail.com>  
Bcc:  
Date: Mon, 10 Jul 2017 21:09:17 +0000  
Subject: 80 Flatbush Avenue Project  
Dear Ms. Maldonado, Ms. Montgomery, Ms. Simon and Mr. Levin:

I am writing to express our deep concern regarding the proposed towers Alloy seeks to build on the small triangle of land located at 80 Flatbush.

My partner Alison Forner and I have lived in One Hanson Place since December 2009. We have watched this neighborhood grow and improve in many wonderful ways since. We love BAM and Barclays and the Theater for a New Audience; crime is down and new restaurants have arrived (as old ones have thrived) while the neighborhood continues to be just that - a neighborhood that is as welcoming and diverse as any you'll find in NYC; the building at 300 Ashland - directly across from us - is both architecturally significant and respectful of the Williamsburgh Savings Bank's (a/k/a One Hanson Place's) historic role in Brooklyn.

Unfortunately, Alloy's proposed towers threaten to destroy all that.

First, this neighborhood simply does not have the infrastructure to accommodate such colossal residential towers. We do not have the grocery stores, restaurants, gyms, pharmacies needed to continue to make this neighborhood habitable. As it is, the increase in subway use at the Atlantic-Barclay Station over the past nine years has rendered what was once a (dare I say) pleasant commute into something barely tolerable.

Second, even if we had the necessary infrastructure, which we do not, we simply don't need that many more apartments in this neighborhood. Indeed, the bulk of residences at the other neighboring towers that have recently been erected (including 300 Ashland) continue to sit vacant.

Third, there is no evidence demonstrating Alloy is even remotely qualified to take on such an extraordinary construction project. Call me a lawyer, but I see: delays; shoddy construction; noise pollution; poor air quality; nuisance; negligence; and lawsuits. (I won't even go into the ill-conceived idea of placing an even bigger school and two colossal residential towers on one of the most dangerous intersections in Brooklyn. Please know, though, that while I'm not a parent, I am a firm believer in public school education and have no doubt the kids deserve a better facility: however, the ends are not justified by the terrible means here.)

Finally, our building is as iconic in Brooklyn as the Empire State Building is in Manhattan. I can't tell you how many paintings, photographs and illustrations I've seen that emphasize our building's symbolic import. (One of my favorites is a New Yorker cartoon we had framed: it shows King Kong on top of One Hanson Place waving at a dinosaur in Manhattan, saying: "I'm telling you, Manhattan is over.") Our building is not only the most prominent building in the Brooklyn skyline visible from Manhattan, it's the first building I spy from the plane when flying home.

Fortunately, concerned citizens, conscientious politicians, and community organizers prevented greedy real estate developers from obliterating everyone's view of the Empire State Building. Conversely, it's clear that if Alloy has it's way, our building's profile will be destroyed. (Tellingly, One Hanson Place doesn't appear in Alloy's artist renderings.) That's why I humbly ask all of you to please think about our community and our neighborhood and reject this proposed construction.

Thank you for your consideration.

Very truly yours,

Martha McBrayer

--

McBRAYER LAW  
Martha M. McBrayer  
244 Fifth Avenue, Suite C257  
New York, NY 10001  
646-931-0750  
[www.mcbrayerlawoffice.com](http://www.mcbrayerlawoffice.com)

July 28, 2017

Jennifer Maldonado, Executive Director

New York City Educational Construction Fund

30-30 Thomson Avenue, Fourth Floor

Long Island City, NY 11101

Re: 80 Flatbush Ave development

I am writing to spell out my concerns about the planned development called 80 Flatbush, but in fact will fill the entire block defined by Flatbush Ave, State St, 3<sup>rd</sup> Ave, and Schermerhorn St and lying south of Schermerhorn Street.

This site will divide Boerum Hill, with its 4 story, 19<sup>th</sup> century homes, and the new Downtown Brooklyn, with its massively tall steel and glass buildings. Rather than being a transitional building, the plans are to create the tallest building in Brooklyn (over 70 stories) as well as another tower that exceeds the height of the Williamsburg Bank Building (just under 40 stories). In design, concept, density and purpose is inappropriate for the site. A building in the scale of those others being constructed on the south side of Schermerhorn would be more appropriate.

None of the studies address the negative impact on the quality of life in Boerum Hill, especially to those that live across the street from the site, which includes me. It is on State Street that, it is proposed, garbage will be picked up (bringing rats), deliveries will be made, bringing excessive traffic from trucks and busses (and therefore unhealthy air and noise pollution). There is a paucity of thought, interest or effort being made to maintain the integrity of the existing neighborhood.

It is also unfortunate that the ECF is part of this development. ECF pits community against schools. It hostilely proceeds without regard to neighborhood, or even the real needs of the community. It is unfortunate that the city chose to use the ECF, rather than properly funding school construction. We are all for more schools, that are so desperately needed, as well as more affordable housing, more green spaces, more bicycle lanes: this is what would improve the quality of life. But the ECF/ alloy project is not the way to achieve new school construction. As it is, the 74 story tower generate no taxes. In essence, the building will be on the dole, getting free police and fire department care, free water, free infrastructure maintenance, while we, in the existing residences, will pay for them. Our taxes will go up.

This is not a well thought out project. It will only bring greater pollution, high-priced apartments. The primary concerns seem to be the bottom line— for both the Board of Ed, the

city and the developer with little regard for the current residents. This is not how to create a healthy long lasting relationship with the community. This is not how to develop a site that the mayor, the borough president, the city councilman, the developer or the residents will be proud of.

Sincerely,

Laura McCallum

526 State Street

Brooklyn, NY 11217

Cc: Steven Levin

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From: Nora McCauley [<mailto:nsmcc@mac.com>]  
Sent: Thursday, June 29, 2017 6:51 AM  
To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>  
Subject: no height variance, maybe not even any residential units

Hi there.

The neighborhood schools are at capacity. There are many buildings in the area already currently under construction that, when they are occupied, will bring the schools over capacity like all the other schools in District 15 (other than the ones in Red Hook).

Before allowing more residential development that affects the schools, the city and DOE really need to play catch up with the overcrowding situation they already have.

Typical schools in the district are built for 800 students. Many are at 120% capacity—which for an 800-seat school means it is hosting 1000 students.

The school offered in this proposal is for around 350 new seats. That is less than half the size of the nearby schools, and will do nothing to alleviate overcrowding in the area unless possibly the buildings themselves contain no residential units.

If the buildings contain 900 residential units as proposed, in this particular moment in time when Brooklyn is a magnet for young families, 900 units will assuredly result in at least 500 children in the building—more than the seats being offered.

The area does need new office space, and Khalil Gibran High School needs updates and repairs. Focus on these win-wins, and get out of the contentious, unwelcome, business of overcrowding public education.

Sincerely,  
Nora McCauley  
PTA co-president, PS 261  
(located at 314 Pacific St between Smith and Hoyt)

[nsmcc@mac.com](mailto:nsmcc@mac.com) | [347 365 0575](tel:3473650575)

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**From:** Kathleen <kmccannon@nyc.rr.com>  
**Sent:** Friday, July 28, 2017 12:12 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 FLATBUSH EIS SCOPING

DEAR MS. MALDONADO,

I AM WRITING TO YOU IN REFERENCE TO 89 FLATBUSH AVENUE WHICH IS PROPOSING A MASSIVE BUILDING PLAN ACROSS THE STREET FROM MY HOME. THIS DEVELOPMENT IS LOCATED WITHIN THE BOERUM HILL AREA AND NOT DOWNTOWN. THEREFORE THE DENSITY IS EXCESSIVE. IN ADDITION LOCATING THE TALLEST TOWER IN BROOKLYN NEXT TO LOW-RISE RESIDENTIAL BUILDINGS IS A VIOLATION OF TRANSITIONAL ZONING AND DESIGN CONTEXT. THE DEVELOPMENT DOES NOT INCLUDE ANY OPEN SPACE FOR THE COMMUNITY. THE STUDY AREA OF 400 FEET IS INADEQUATE FOR SUCH A STUDY. A HALF – MILE RADIUS IS NEEDED.

----- Forwarded message -----

From: Jackson Merchant <jacksonvm1@gmail.com>

To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>

Cc:

Bcc:

Date: Thu, 6 Jul 2017 01:51:29 +0000

Subject: 80 Flatbush EIS Comments

Dear Ms Maldonado,

Please find attached my letter of comments for the ECF 80 Flatbush impact study process.

Sincerely,

Jackson Merchant  
556 State Street

Jackson Merchant  
556 State Street, Apt 8AN  
Brooklyn, NY 11217

July 5, 2017

To: Jennifer Maldonado  
Executive Director  
New York City Educational Construction Fund  
30-30 Thomson Avenue, 4<sup>th</sup> Floor  
Long Island City, NY 11101

Re: 80 Flatbush Avenue - Scope of Work for the EIS

Dear Ms. Maldonado,

I am writing regarding the proposed EIS for the 80 Flatbush Avenue project. I am a resident, owner, and board member of a 71-unit condominium apartment building called Boerum Heights at 556 State Street, which is directly across from the project site. I have lived on this block and in the building for over 10 years.

The impact this project would have on our residents and their families and neighbors during the demolition/construction phase, and once the construction project is complete, would be severe. I have many concerns about this project that I feel should be considered in the scoping plan for the Environmental Study:

- Should the plan encompass a larger area to be surveyed, a minimum of ¼ mile, but ideally one mile perhaps?
- Is the density and height/scale in relationship to brownstone Brooklyn (FAR of 18) too much for the block and surrounding area to absorb such an increase in population and activity?
- What will be the traffic, safety and zoning impact of the proposed loading dock and parking garage entrances on State Street, which is an extremely narrow and residential street?
- Will the traffic, water, sewer, public transit, pedestrian safety, noise, air quality, and parking space be able to handle these new towers?
- What does a study regarding the impact of shadows, wind tunnels, and sun reflections show will be the impact on the surrounding blocks?
- What are the net school seat benefits to the surrounding school districts with ~900 new families in just this block development alone?
- Will a call time and street access analysis be done for NYFD Engine 226 on State Street?
- What will be the effects of trucks, materials, and cranes impacts on the 500 block of State Street and all of Boerum Hill during the long demolition and construction processes? Can the duration of the project be shortened by reducing the ambitious scope?
- What will happen to the value of the local homes on the 400 and 500 blocks during this massive project and post the glut of the already built and these proposed new units coming to market? How badly will the 8 year building timetable devalue the residences on our 500 block?

I am sure that many of these issues have been raised already or will be raised by others, but I just want to emphasize that the decisions made on this project will impact my family's lives, the lives of my neighbors, and of my neighborhood for many years to come.

Sincerely,

Jackson Merchant

----- Forwarded message -----

From: Jackson Merchant <[jacksonvm1@gmail.com](mailto:jacksonvm1@gmail.com)>

To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>

Cc:

Bcc:

Date: Sat, 22 Jul 2017 14:30:57 +0000

Subject: Re: 80 Flatbush EIS Comments

Dear Ms Maldonado,

Please find attached my updated letter of comments for the ECF 80 Flatbush impact study process. This one includes one key change which is the addition of point #9 from my July 5th submission.

9. How can the health of the 500 State Street block and other nearby residents be ensured from the airborne potential health hazards that the demolition phase and then construction phase could produce? The buildings being demolished seem old and I fear how their contents/materials will impact my family's health when we have that demolition dust and air get onto our block and potentially into our homes (we are only 60 feet away!)?

Sincerely,

Jackson Merchant  
556 State Street

Jackson Merchant  
556 State Street, Apt 8AN  
Brooklyn, NY 11217

July 22, 2017

To: Jennifer Maldonado  
Executive Director  
New York City Educational Construction Fund  
30-30 Thomson Avenue, 4<sup>th</sup> Floor  
Long Island City, NY 11101

Re: 80 Flatbush Avenue - Scope of Work for the EIS

Dear Ms. Maldonado,

I am writing regarding the proposed EIS for the 80 Flatbush Avenue project. I am a resident, owner, and board member of a 71-unit condominium apartment building called Boerum Heights at 556 State Street, which is directly across from the project site. I have lived on this block and in the building for over 10 years.

The impact this project would have on our residents and their families and neighbors during the demolition/construction phase, and once the construction project is complete, would be severe. I have many concerns about this project that I feel should be considered in the scoping plan for the Environmental Study:

1. Should the plan encompass a larger area to be surveyed, a minimum of ¼ mile, but ideally one mile perhaps?
2. Is the density and height/scale in relationship to brownstone Brooklyn (FAR of 18) too much for the block and surrounding area to absorb such an increase in population and activity?
3. What will be the traffic, safety and zoning impact of the proposed loading dock and parking garage entrances on State Street, which is an extremely narrow and residential street?
4. Will the traffic, water, sewer, public transit, pedestrian safety, noise, air quality, and parking space be able to handle these new towers?
5. What does a study regarding the impact of shadows, wind tunnels, and sun reflections show will be the impact on the surrounding blocks?
6. What are the net school seat benefits to the surrounding school districts with ~900 new families in just this block development alone?
7. Will a call time and street access analysis be done for NYFD Engine 226 on State Street?
8. What will be the effects of trucks, materials, and cranes impacts on the 500 block of State Street and all of Boerum Hill during the long demolition and construction processes? Can the duration of the project be shortened by reducing the ambitious scope?
9. How can the health of the 500 State Street block and other nearby residents be ensured from the airborne potential health hazards that the demolition phase and then construction phase could produce? The buildings being demolished seem old and I fear how their contents/materials will impact my family's health when we have that demolition dust and air get onto or block and potentially into our homes (we are only 60 feet away!)?
10. What will happen to the value of the local homes on the 400 and 500 blocks during this massive project and post the glut of the already built and these proposed new units coming to market? How badly will the 8 year building timetable devalue the residences on our 500 block?

I am sure that many of these issues have been raised already or will be raised by others, but I just want to emphasize that the decisions made on this project will impact my family's lives, the lives of my neighbors, and of my neighborhood for many years to come.

Sincerely,

Jackson Merchant

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**From:** Ellen Meyers <ellen@ellenmeyers.com>  
**Sent:** Friday, July 28, 2017 3:52 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 Flatbush

It's outrageous that school construction is dependent on developers seeking to destabilize communities and neighborhoods. While I am a strong proponent of public education and affordable housing oversized rampant development is a bad solution with too many negative consequences. This project should be stopped!

Sent from my iPhone

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**From:** Viviana Miller <264dean@gmail.com>  
**Sent:** Friday, July 28, 2017 3:20 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 Flatbush Scoping - Alloy Development

Jennifer Maldonado, Executive Director  
New York City Educational Construction Fund  
30-30 Thomson Avenue, Fourth Floor  
Long Island City, NY 11101

Madam,

As a long time resident of Boerum Hill and member of the Boerum Hill Association I have been following with dismay the developments on this project.

To start, such a large group of buildings would increase the density enormously affecting traffic, commuting, noise. The subway stations are already at full capacity during rush hours, is the MTA able to absorb the additional volume?

The congestion of the area will be very dangerous for children who are coming to school there, who is taking responsibility for their safety?

Children and adults need open space - where is it? Instead of such big buildings some open space is necessary.

Locating the tallest tower in Brooklyn next to low-rise residential buildings is a violation of transitional zoning. Besides, the buildings are in Boerum Hill, NOT in Downtown Brooklyn. I could go on, but I leave it here in the hope that you will read this and take these thoughts into consideration.

Sincerely,  
Viviana Miller  
264 Dean St.  
Boerum Hill

From: zachary grace model <zachary.model@gmail.com>  
To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>  
Cc: "montgome@nysenate.gov" <montgome@nysenate.gov>, "simonj@nyassembly.gov" <simonj@nyassembly.gov>, "slevin@council.nyc.gov" <slevin@council.nyc.gov>  
Bcc:  
Date: Tue, 11 Jul 2017 03:45:00 +0000  
Subject: 80 Flatbush Environmental Impact Assessment Scoping Document

Dear Ms. Maldonado,  
New York City Educational Construction Fund,  
State Senator Montgomery,  
Assembly Member Simon,  
City Council Member Levin,

I am writing to share my concerns below regarding the draft scoping document for the Environmental Impact Assessment for the 80 Flatbush Project.

Neighborhood Setting:

80 Flatbush is in a residential brownstone Brooklyn neighborhood. It's current designs are totally out of keeping with this brownstone neighborhood. Zoning should reflect the neighborhood.

Transparency of the public RFEI process?

What was the public RFEI process? Where is the original RFEI document? When did the process occur? How were competitive bids sourced? Who were the other bidders? Who was on the review committee? What were the criteria for selecting the most qualified developer among all bidders? Who were the finalists considered?

Transparency re the use of public funds via ECF?

How much taxpayer dollars will go to fund the school portion of the 80 Flatbush Project? What will the term of the tax-free bonds be? If the project goes bankrupt after issuing the bonds, who will be responsible for paying the bond-holders? In addition to paying for the school, what form of tax abatement or other benefit will be issued for the building?

Alloy, LLC:

What are Alloy LLC's qualifications to build a project of this scale? How will a 14-person firm complete a project with as many floors as the 1 World Trade Tower? What happens if the project fails or goes bankrupt mid-stream? What is the contingency plan to ensure it won't be left as an incomplete construction site with no new schools as promised?

Area of Environmental Impact Assessment:

I request an extended impact area of at least 1-mile radius.

Negative impact on school overcrowding

By NYC DOE math, every 100 units of residential housing will yield 55 public school students: The 922 proposed residential units of 80 Flatbush will bring 507 new students. The new 350-seat elementary school will be a net negative of 157 seats (the new Khalil Gibran H.S. is just a replacement for existing seats) By NYC DOE math, the school aspect of the project will contribute to local overcrowding, not alleviate it.

### Zoning Exceptions :

FAR increase request from 6 to 18 is 3x what it is zoned for. If Alloy does not receive the FAR exception, they have said they will not build the school. Changing site zoning from C6-2 to C6-6 is unprecedented and unjustified. Project is requesting an exception ignore any setback zoning requirements. This would allow the 38-story phase-1 tower to build straight up from the street with no setback. This will block light from all surrounding areas in all directions.

### Project Size/Density

A glass skyscraper the size of the Chrysler building will dramatically change the fabric of the residential neighborhood and surrounding area of Brownstone Brooklyn. This project does not respect the surrounding neighborhood. The two towers will block the site lines of the Landmarked Williamsburgh Savings Bank Tower from most western neighborhoods, including Manhattan and the Harbor.

### Safety / Traffic congestion / public transportation / pedestrian safety

The 80 Flatbush Ave development site is located at one of the busiest crossroads in New York City. 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 • The addition of a loading dock on State Street near a public school entrance and the tower's residential entrance will compromise pedestrian safety. • 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? Area traffic and public transportation are already congested, especially during events at the Barclay's Center. How will this project avoid making these issues untenable? Such massive structures change the complexion of the neighborhood with no real coordinated approach at neighborhood and city planning.

### Glare / Wind / Shadow Impacts

Structures of this size can have a substantial impact on the aerodynamics of an area. The corner of Flatbush and Hanson Place is already one of the windiest corners in Brooklyn and has been made more so with the addition of 300 Ashland and The Hub. •The impact study needs to include an assessment of the potential impact of the change in wind patterns and potential impact on the surrounding neighborhood. Similarly, glare from glass towers affect light, heating, cooling etc. of nearby residences. The need for the expansion of the impact radius is necessary to fully address the potential impact of shadow, wind, and glare from a nearly 1,000 foot structure.

### Public Green Space

The neighborhood's limited green spaces are already congested and overused. Why is this project not offering any additional public space or green space like the public plaza recently opened at 300 Ashland?

### Construction hours / noise / pollution / duration / vibrations / damage impact:

During what hours / days of the week will construction take place? If the goal is to keep the Khalil Ghibran school open during the entire project, will that push construction hours to nights and weekends, further disrupting the residential neighborhoods? What steps is Alloy planning to take to mitigate construction noise, dust and other pollution that may be harmful to students, residents, tourists, etc. If the construction unearths lead, asbestos or other toxic substances in the demolition of buildings from the 1860s, what steps will Alloy take to notify the public and remediate? What is Alloy going to do to minimize the impact on the community of this project

during an 8-year construction timeline? What compensation will be given to the neighborhood if the project goes over the projected timeline or fails in the middle? What measures will be taken to ensure the construction of such a largescale project in a residential neighborhood does not inflict damage on the historic brownstones on State Street as well as the the landmarked Williamsburgh Savings Bank tower across the street? If damage is incurred, what compensation is Alloy prepared to offer area residents?

As of Right Design:

What would an as of right building look like? Alloy and the ECF have not provided a design of what they would build with no zoning exceptions. Why is Alloy not offering to include schools, the ECF and cultural space in the project if they do not obtain the zoning exceptions they are requesting?

Thank you for considering my comments,

Respectfully,  
Zachary Model

**ECF 80 Flatbush Avenue**

*Draft Scope of Work for an Environmental Impact Statement*

**COMMENT SHEET**

NAME: Anne Montero

ADDRESS: 1 Hanson Place #175

E-MAIL: amontero@packer.edu

**COMMENTS:**

The study area needs to include a minimum of a half mile radius around the development site. Honestly, if the shadows of the building extend past the study area, then the area isn't large enough. Please share renderings of what kind of shadows these towers will cast - don't cut the shadows off in the renderings just because they fall outside of the study area. Show the community an honest representation of the impact of this building(s). It's dishonest to limit the scope of the Environmental Impact Statement.

Also, a question: when can the community expect to receive the results of the EIS? Is the report due before the re-zoning decision is made? I sure hope so!

Thanks!

**Comments must be received by Monday, July 10, 2017.**

Your comments may be submitted in person at tonight's meeting or by mail/email to:

Jennifer Maldonado  
Executive Director  
New York City Educational Construction Fund  
30-30 Thomson Avenue, 4th Floor  
Long Island City, NY 11101  
Email: [KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)

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**From:** Jesse Montero <jesse.a.montero@gmail.com>  
**Sent:** Monday, July 10, 2017 8:36 AM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** Proposed Building Project on Flatbush

To Whom It May Concern,

My name is Jesse Montero and I am concerned resident. I am worried that building a huge mega tower will complete change the future of our neighborhood. With the current rate of development, Brooklyn will look and feel more like midtown Manhattan. The amount of people in midtown is not what Brooklyn is about. Fix the school that is need of new resources. But do not use the school as a vail for this unreasonable sky tower. If you are going to build apartment buildings, build as high as you are allowed by the neighborhood zoning laws.

Do not allow greedy and money to be your main focus. Profit is important to any business, I understand that, but do not let it blind you and the people around you.

We are the ones that will be living here, not you.

Please use your true heart in deciding the fate of our community!

Thank you for your time!

Sincerely,  
Jesse Montero

From: George <cng2@earthlink.net>

To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>

Cc:

Bcc:

Date: Tue, 11 Jul 2017 00:05:45 +0000

Subject: 80 Flatbush Avenue

This project will be way too tall for our neighborhood. I live close by in Boerum Hill.

Everything within a half mile from the site should be considered and all the studies required for this proposal.

We don't need buildings this tall in our neighborhood. The effect on our infrastructure will be devastating. It seems each new project that comes along has to be taller than the next one. This is egocentric Construction. Not based on what is beneficial to the surrounding areas. Thank you

George Nader  
from my iPhone

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**From:** marisa@marisaoffice.com  
**Sent:** Sunday, July 09, 2017 5:42 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 Flatbush Scoping Comments

Dear Ms. Maldonado,

I am a resident and owner at One Hanson Place, and I have lived in this area for nine years. I write to provide my comments on the proposed scoping for the 80 Flatbush development. Specifically, I believe the scoping should include detailed explanations to the following questions:

- How will Alloy mitigate the impact of seven years of construction? Specifically, how will Alloy address the noise levels from construction, which I understand must occur outside of school hours, as well as the traffic from construction workers and diverted traffic from State Street?
- How do the proposed towers fit with the character of the neighborhood? The proposed plans envision 38+ story glass towers abutting traditional Brooklyn brownstones and low-rises.
- Why are waivers of the setback and FAR requirements justified here? I fully support improved school facilities, but these facilities can be improved without building two enormous and incongruous towers. It would seem that any additional seats for the schools would be offset by the 922 residential units, many of which would presumably have children. To the extent it is less profitable for Alloy to build within the existing zoning limitations, then it must reconsider its ability to undertake this project. Alternatively, the city should contribute funding to the school improvement.
- What will be the impact of 900+ residential units on the Manhattan-bound subways during the morning commute and the Brooklyn-bound subways during the evening commute? I understand from Alloy that its position is that the Atlantic Terminal subway station is underutilized, but the crushing crowds in the Manhattan-bound subway cars every morning tell a different story.
- What will be the impact of 900+ residents on local green space, which is already overburdened?
- Why is the proposed radius only 400 feet? This study must consider the full impact of the multiple new developments in the downtown Brooklyn and Boerum Hill area, many of which are just outside the proposed perimeter.
- How will the proposed towers obstruct the neighborhood views of the Williamsburg Savings Bank building? This is an historic building that has defined the Brooklyn skyline for decades. As currently designed, these towers will block the view of the towers for a large portion of the area.

Thank you for your consideration of these issues.

Sincerely,

Marisa Office

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**From:** john papp <jbpapp@gmail.com>  
**Sent:** Friday, July 28, 2017 12:05 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 Flatbush EIS Scoping

Hello,

As a resident of one of the State Street blocks potentially affected by the proposed large-scale development at 80 Flatbush, I am very much opposed to the project as currently outlined. This development is located in our neighborhood of Boerum Hill, not downtown Brooklyn. Locating the tallest tower in Brooklyn next to low-rise residential buildings such as ours will drastically impact our quality of life. I urge you to conduct a more thorough environmental impact study to investigate the negative effects this project will have on our awesome neighborhood.

Thank you for your time.

John Papp

----- Forwarded message -----

From: Robert A Patrick <[rpatrick@me.com](mailto:rpatrick@me.com)>

To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>

Cc: "[montgome@nysenate.gov](mailto:montgome@nysenate.gov)" <[montgome@nysenate.gov](mailto:montgome@nysenate.gov)>, "[simonj@nyassembly.gov](mailto:simonj@nyassembly.gov)" <[simonj@nyassembly.gov](mailto:simonj@nyassembly.gov)>, "[slevin@council.nyc.gov](mailto:slevin@council.nyc.gov)" <[slevin@council.nyc.gov](mailto:slevin@council.nyc.gov)>

Bcc:

Date: Tue, 25 Jul 2017 14:02:42 +0000

Subject: Please stop the 80 Flatbush project

Good morning,

I am writing today to ask that you please do all that is in your power to reassess and stop the 80 Flatbush project. I live on State St, just a block down from the proposed site and this type of construction and large occupancy building is not appropriate for the small scale brownstone area.

The project seems rife with issues and inconsistencies with local building codes. First off, it is listed as a Downtown Brooklyn project but no part of the site is inside the borders of Downtown Brooklyn? A 112 story building would stand out in any part of NYC, but to plop it down at the corner of Flatbush and Schermerhorn seems outrageous. We do not need another mammoth scale residential development in the area, especially with tax-payer funded bonds helping finance the project.

Please stop this inappropriate project and either require developer to scale down the project to fit the neighborhood or please have the courage to terminate any and all permits.

Thank you for your time and I hope you make the right decision.

Robert Patrick

447A State St. #2

Brooklyn NY 11217

[917.509.8658](tel:917.509.8658)

From: Sue Patrick <lapatricks@gmail.com>  
To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>  
Cc:  
Bcc:  
Date: Mon, 10 Jul 2017 21:23:16 +0000  
Subject: 80 Flatbush Project

As a condo owner in One Hanson Place I am writing to ask you to NOT allow a building a big as the Chrysler Building to loom over Brooklyn. I have read the meeting summary and the questions about the accuracy of the information disseminated after the June meeting. I plead with you to reduce the size of the two towers. Brooklyn neighborhoods are changing but not to the degree this project would bring. Since it is NOT in downtown Brooklyn, it does not suit the neighborhood and should be either not built at all or note built to be a behemoth, out- of - character structure in our neighborhood!

The school increases are over-exaggerated and it is not n downtown Brooklyn. Those two items alone should make he project unacceptable!

Please keep the uniqueness of Brooklyn an help it grow in a better way!  
Thank you,  
Sue and Kirk Patrick  
One Hanson Place, 25E

Sent from my iPad

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**From:** Joan Pleune <jpleune@earthlink.net>  
**Sent:** Sunday, July 09, 2017 7:50 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** comments on 80 Flatbush

Dear Ms. Maldonado,

My name is Joan Pleune. I have lived on the corner of State and 3rd for 33 years. Until 8 years ago I lived at 514 State in a lightless, small, dump of an apartment. 514 is directly across the street from the old working paper building. I raised my 3 children there. Most often we used the oven for heat. Eight years ago the last of my children left home and my rent was rising astronomically. The YWCA was in the process of renovating 4 floors of rent stabilized, subsidized studio apartments for single people. I was lucky enough to win the lottery on one of these apartments. I chose a corner studio apartment with four huge windows--2 on State Street and 2 on 3rd Avenue--catty corner to--you guessed it--the old working paper building. I've never hung shades or drapes in my new digs. I love the sunlight and its reflections streaming in my windows. When my application for this housing was approved, I thought I had died and gone to heaven. My now grown children and I formed a convoy and moved me from the southeast corner of State and 3rd to the southwest corner. I've been there 8 years now. When I first moved in I watched the sunrise on sunny days. But then some mean-spirited developer with no taste built 300 Ashland place and took my sunrise away. Even at that, I still get enough sunlight to grow cactii. All that is about to change. My sunlight, and to some degree my happiness with it, is in jeopardy. My quality of life (such as it can be on that already congested, noisy corner) is threatened in order that more upper income housing can be built in a neighborhood that is already too affluent. It is Brooklyn's disgrace that this property is not being used to build Khalil Gibran a new school, and provide some green space for the entire neighborhood--both the folks who live here and the folks who work in the downtown area. It's not impossible to envision mixed use space that can benefit young and old alike and everybody in between. We who live in the YWCA have no place to sit and watch the world go by. Many of us are on the plus side of 65 and that's one of the things we like to do. You'll find us sitting in the bus stop at 3rd and Atlantic pretending we're actually going somewhere. Don't you think Brooklyn can do a little better for her old people?

I want to be clear. I am not a brownstoner. If a modified version of the current plan were to be proposed that would provide housing and green space for folks who don't have much--such as those of us who live in the Y or people who work at Target--I would suck it up and put up with

some loss of sunlight and the additional noise, congestion and pollution that such a project would entail. But that's not what's on the table here. So I join forces with my brownstone neighbors (whose concerns don't always mesh with mine) in opposing this project. If they decide to put their bodies on the line and block the bulldozers, they can count me in.

Sincerely,

Joan Pleune

30 3rd Ave., Apt. 5L

Brooklyn, NY 11217

## Comments re Scoping 80 Flatbush in Boerum Hill, Brooklyn

Expand the scoping area. My house will be massively impacted by this project and it is unbelievable that it is out of the proposed scoping area. Minimum distance should be a mile from the edge of the project in all directions.

The 400 block of State St is exhausted from construction. 333 and 319 Schermerhorn disrupted, and continue to disrupt, our block. In addition there are two private extensive and unfortunate renovations currently on the north side of the block. We have had and have a bad rodent problem, a trash problem, a noise problem, a flying Styrofoam problem, a cement dust problem, dumpster problems, TRAFFIC problems, not to mention loss of sky. We do not need another construction project anywhere nearby.

Under Task #4 We do not know what the density of the various new Schermerhorn St and Atlantic Ave projects between Hoyt and Third will do to basic needed services. Fire safety is the most obvious problem. The fire trucks already get blocked. There is no way to widen State St. How is it proposed to solve this problem?

Under Task #8 The east side of Third Avenue between State and Schermerhorn is a visually pleasant and peaceful stretch of buildings. Why chop it up?

Under Task #10 What kind of pressure will the proposed building place on our elderly water and sewer systems, which already seem a bit iffy? Several sinkholes on State.

Under Task #11 The traffic situation is often frightful between 3 and 5pm, even without the occupation of any of the new units on Schermerhorn and Atlantic. How will you prevent State St from becoming a parking lot, spewing fumes on us all? (I have strayed into Task #12).

How many persons can fit on the Nevins St subway platforms? The Hoyt-Schermerhorn platforms? The Atlantic Barclays platforms and tunnels?

Under Tasks #14 & #17 The noise of the 333 Schermerhorn loading dock alone is truly awful. At least the air hammers are gone, only to be brought back to us by you. How are you going to tear down those buildings quietly? .

I suggest three additional tasks. Glare, Wind Noise, and Morality. ,

Under Morality: How will your respective consciences allow you to build ANY luxury housing when so many persons are without housing at all? How can you destroy perfectly good buildings, adding to the landfill and taking more resources? (This is particularly true since there is indication that NYC will be under water by 2050, which means an extremely hefty investment for a 25 year use.) How can you be content with Task #18 which basically says if we can't mitigate we are just going to do it anyway.

Eleanor Preiss  
439 State St. (Nevins/Third)  
Brooklyn, NY 11217

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From: SANDY REIBURN [<mailto:sandyr11217@yahoo.com>]

Sent: Wednesday, July 12, 2017 4:52 PM

To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>

Cc: [slevin@council.nyc.gov](mailto:slevin@council.nyc.gov); [jbourcher@council.nyc.gov](mailto:jbourcher@council.nyc.gov); Laurie Cumbo <[lcumbo@council.nyc.gov](mailto:lcumbo@council.nyc.gov)>; Monica Abend <[mabend@council.nyc.gov](mailto:mabend@council.nyc.gov)>; Bearak Richard (BROOKLYNBP) <[rbearak@brooklynbp.nyc.gov](mailto:rbearak@brooklynbp.nyc.gov)>; Isabella Pori <[porii@nyassembly.gov](mailto:porii@nyassembly.gov)>; Anayeli Gomez <[agomez@comptroller.nyc.gov](mailto:agomez@comptroller.nyc.gov)>; Brooklyn Community Board 2 <[cb2k@nyc.rr.com](mailto:cb2k@nyc.rr.com)>

Subject: 80 Flatbush. Ave ..Bait and Switch Plans

Jennifer Maldonado  
NYC Educational Construction Fund  
30-30 Thomson Ave  
LIC, NY 11101  
[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)

A Fort Greene neighbor's appraisal of the Alloy/NYC Educational Construction Fund for 80 Flatbush Ave

Is this Bait and Switch?

July 12<sup>th</sup>, 2017

Dear Ms Maldonado,

In looking at the SEQR/CEQR # 17ECF001K, there are far too many discrepancies and evasions of fact which have created skepticism and anger about this would-be project. I'm going to reference a few.

I, along with many adjacent neighbors to this proposed 80 Flatbush Ave plan, feel this is a barely disguised ploy by Alloy and the City Educational Construction Fund for self-serving luxury housing development at the expense of the community. The proposal makes a disingenuous case evading the onerous effects of this plan in the alleged service of building/remediating schools-even as admittedly more schools are sorely needed to keep up with Wild West over-density & thoughtless over-development with under-implemented infrastructure.

There is insufficient data revealed about the costs to the public of the subsidies for the project-the cost/benefit ratio. Other & possibly more economical supports via alternative options are not being offered to us. More data is required ...we are owed this information as tax paying residents of New York City.

The 'study area' is also insufficient...limiting it to 400' will not comport with the shadow cast by the actual height of the almost 1000 foot tower. It is a poor template for understanding the possible effects of this non-contextual and excessive overreach.

Not only will the outsize and lengthy impacts be felt by neighboring residents during this specific plan for reconstruction ...the future design plans for thwarted automotive access and egress in an already overburdened and thoughtless DOT planning-will exacerbate this squeeze to the detriment of a community which has been cavalierly dismissed by the DOT. The congestion is already tantamount to being in a third world country...before you/Alloy even begin.

The fixation on Pedestrian Plazas as if they were a predetermined requirement indicates the suspect & troubling rigid urban development cant of the moment. There are abundant...yes...excessive...'plazas' within a several block radius of this 80 Flatbush Ave plan. To name just two: the Times Plaza and the recently opened 15,000 foot plaza at 300 Ashland (Lafayette and Fulton). The proposed Schermerhorn/3<sup>rd</sup>Ave/Flatbush triangle as yet another planned 'plaza' -will impede traffic even more.

The seizing of land/sites by for-profit developers as a de facto gift by the HPD along with a failure of responsibility by the city to provide increased schools for the increased density that the Mayor's one-size-fits-all thoughtless rezoning enables -will be protested and fought against...tooth and nail.

Sincerely,  
Sandy Reiburn  
100 South Elliott Place  
Brooklyn, NY 11217

[718 625 1848](tel:7186251848)

----- Forwarded message -----

From: Emily Reid <emwilson@gmail.com>

To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>

Cc:

Bcc:

Date: Sat, 29 Jul 2017 15:55:20 +0000

Subject: proposed new building at 80 Flatbush avenue

Hello,

I am a Boerum Hill Resident and would like to submit a community statement against the new building at 80 Flatbush. Our neighborhood should not have any more high rise buildings - they are turning our neighborhood into a sea of luxury buildings and changing the historic district we live in and love. Please do not approve ANY more high rise buildings in Boerum hill, especially this one at 80 Flatbush Ave.

Thank you,

Graham and Emily Reid

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Book Blogger, Books, the Universe, and Everything

@chowmeyow

"It is not down in any map, true places never are." -Herman Melville

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**From:** Mary T. Reilly <mreilly@hillbetts.com>  
**Sent:** Friday, July 28, 2017 3:49 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 Flatbush Avenue

As a resident of Boerum Hill, where the 80 Flatbush development will be located, I am writing to express my deep concern about the scope of this new building and its impact on the neighborhood resources.

I understand this proposed building will be the **tallest** in Brooklyn. Locating a building of this size next to a low profile residential neighborhood, many of 1, 2 and 3 family homes, violates transitional zoning and design context.

I also understand the size of the area for the Environmental Impact Study is only 400 feet! This size is absolutely inadequate to study the impact, direct and indirect, of this project. The EIS size should be at least one-half mile. It should include drawings and elevations of the no action plan. It should include a comparison elevation of heights of all buildings over 12 stories in the study area.

The proposed benefit --350 seats at the elementary level -- represents a very small school. Also, I understand that the City uses a guideline of 55 students per 100 units; given the planned 900 units so that number of seats does not even meet the need of this proposal -- a net loss !

It also is significant that the development does not include any open space for the community. The only green space shown is a small space on the roof of the school, which space may well not be accessible for public use.

The neighborhood welcomes schools and affordable housing but not at the expense of overwhelming our neighborhood for negligible, if any, benefit.

Please let me know that you have received my comments and keep me informed.

Best regards,

Mary Terry Reilly  
122 Dean Street  
Brooklyn, N.Y. 11201

----- Forwarded message -----

From: Ben Richardson <ben.richardson@gmail.com>

To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>

Cc: "askeric@brooklynbp.nyc.gov" <askeric@brooklynbp.nyc.gov>, Richard Bearak <rbearak@brooklynbp.nyc.gov>, "montgome@nysenate.gov" <montgome@nysenate.gov>, "simonj@nyassembly.gov" <simonj@nyassembly.gov>, "slevin@council.nyc.gov" <slevin@council.nyc.gov>, "lcumbo@council.nyc.gov" <lcumbo@council.nyc.gov>

Bcc:

Date: Fri, 28 Jul 2017 21:09:13 +0000

Subject: Comments on 80 Flatbush EIS draft scoping document

Jennifer Maldonado, Executive Director

New York City Educational Construction Fund

30-30 Thompson Avenue, 4th Floor

Long Island City, New York 11101

Dear Ms. Maldonado

As a 22-year resident of New York City, a 10-year resident of Brooklyn, and a 5-year resident of Fort Greene, I strenuously object to the project at 80 Flatbush as currently proposed. I feel strongly that there are numerous issues that need to be addressed, both in the process that has been undertaken to-date to foist this project on an unsuspecting community, the lack of transparency in the ECF's process, and the disrespect the scale of this project shows for the neighborhood.

My family and I moved to Brooklyn to seek a more cultured, more residential lifestyle, not to replicate our experience in Manhattan. Adding a mass to an otherwise residential neighborhood that, with 112 stories in total is larger than the Freedom Tower, is simply put an insult to the community of Brooklyn, the BAM Cultural District, and the historic buildings such as the Williamsburgh Savings Bank that it would obscure from view even more than the recent smaller towers already have.

Below are the issues I have with the project and the Environmental Impact Study Scoping document as currently proposed:

80 Flatbush neighborhood location clarification:

- No part of the site of 80 Flatbush is in Downtown Brooklyn

- The Boerum Hill border is Schemerhorn & Flatbush
- Fort Greene border extends to Flatbush to Dekalb and DeKalb (as Ms. Cumbo can confirm)
- Downtown Brooklyn starts North of Schemerhorn and West of Flatbush
- The site is NOT in downtown Brooklyn. It is in residential Brownstone Brooklyn, and zoning should reflect that.
- Misstating that is downtown Brooklyn as a way to justify such excessive mass and density is disingenuous at best.

Complete lack of ECF RFEI public process transparency:

- The ECF uses tax payer funds to build schools by issuing tax-free bonds backed by the credit of the City of NY.
- The ECF allegedly put out a bid for developers to partner with on the project of rebuilding the Khalil Gibran High School, but there is no record of such process to be found anywhere.
- What transparency was provided on this public RFEI process?:
  - o What was the public RFEI process?
  - o Where is the original RFEI document?
  - o When did the process occur?
  - o How were competitive bids sourced?
  - o Who were the other bidders?
  - o Who was on the review committee?
  - o What were the criteria for selecting the most qualified developer among all bidders?
  - o Who were the finalists considered and the other projects proposed?
  - o None of this appears to be outlined on the ECFs website about the project:  
<http://schools.nyc.gov/community/facilities/ecf>
- I would request additional transparency about the use of public funds via ECF:
  - o How much taxpayer dollars will go to fund the school portion of the 80 Flatbush Project?
  - o What will the term of the tax-free bonds be?

- o If the project goes bankrupt after issuing the bonds, who will be responsible for paying the bond-holders?
- o In addition to paying for the school, what form of tax abatement or other benefit will be issued for the building?
- o The community and its citizens deserve to see a complete balance sheet and financial project about how this project will use city and state tax-payer funds. Will some portion of those funds go to non-school portions of the project in an inadvertent way?
- o The repeated statement that this project uses no city funds is not factually correct. It uses tax-payer funds, plain and simple.
- Financial Analysis of alternatives:
  - o The DOE and the SCA obviously exist to build school facilities. If the amount of tax payer funds that will be used to provide tax breaks for the bonds and other abatements to support the project were simply applied to building a new school directly, what would that project look like?
  - o The city could very likely build a comparable or better set of schools with the same or less than will be used for this ECF version of the project.
  - o Also, giving up the rights to the land and air rights for 99 years is an extremely high price to pay to “not use any city funds”

Comments / Concerns about Alloy, LLC:

- What are Alloy LLC’s qualifications to build a project of this scale?
- Their largest project to-date was 1 John Street, a 42-unit boutique condo project in DUMBO: <http://www.alloyllc.com/work/one-john-street>
- How will a 14-person firm complete a project with more floors than the Freedom Tower?
- What happens if the project fails or goes bankrupt mid-stream? What is the contingency plan to ensure it won’t be left as an incomplete construction site with no new schools as promised?

Expand Area of Environmental Impact Assessment:

- The scoping document proposes an environmental impact assessment area of a 400-foot radius around the site.
- That covers an area bordered by:

- o North: Livingston & Flatbush
- o South: Atlantic & 4th Ave.
- o East: One Hanson Place (Just short of St. Felix St.)
- o West: State (bet. 3rd – Nevins)
- Request: extend impact area to 1-mile radius (5,280 ft.)

80 Flatbush school concerns:

- Negative impact on school overcrowding
- o DOE / SCA formula for projecting public school students:
- o <http://www.nycsca.org/Community/Capital-Plan-Reports-Data#Housing-Projections-70>
- o Every 100 units of residential housing will yield 55 public school students:
- o The 922 proposed residential units of 80 Flatbush will bring 507 new students.
- o The new 350-seat elementary school will be a net negative of 157 seats (the new Khalil Gibran H.S. is just a replacement for existing seats)
- o By NYC DOE math, the school aspect of the project will contribute to local overcrowding, not alleviate it.
- o Local zoned public schools including P.S. 38, P.S. 261, P.S. 133 are already at or close to 100% capacity.

Noise impact on learning:

Research shows noise (such as construction noise) can have a severe adverse impact on students' ability to learn.

The plan calls for keeping the KG H.S. open for the entire project and keeping the new elementary school open during construction of phase 2.

<http://www.thirteen.org/metrofocus/2012/08/gauging-the-impact-of-noise-on-childrens-learning/>

- Traffic danger for students:
- o Having 350 students enter / leave a high school on Flatbush Avenue daily is dangerous to the students.

Zoning exceptions requests:

- FAR increase
  - o FAR increase request from 6 to 18 is 3x what the lot is zoned for.
  - o This will allow 112 stories to be build on the site vs. approx. 34
  - o If Alloy does not receive the FAR exception, they have said they will not build the school.
  - o Changing site zoning from C6-2 to C6-6 is unprecedented and unjustified. As noted above, this site is not in Downtown Brooklyn and no area of Downtown Brooklyn is zoned above C6-4.
- Setback requirement removal
  - o Project is requesting an exception ignore any setback zoning requirements.
  - o This would allow the 38-story phase-1 tower to build straight up from the street with no setback.
  - o This will block light from all surrounding areas in all directions and again is unjustified. The Flatiron building in Manhattan was build prior to any zoning laws and so requesting to go back to that is irrational in a modern construction project such as this one.

Project Size / density concerns:

- Requested FAR increase from 6 to 18 is 3x what is zoned for this residential neighborhood.
- A glass skyscraper the size of the Chrysler building will dramatically change the fabric of the residential neighborhood and surrounding area of Brownstone Brooklyn.
- This project does not respect the surrounding neighborhood.
- The two towers will block the site lines of the Landmarked Williamsburgh Savings Bank Tower from most western neighborhoods, including Manhattan and the Harbor.

Safety / Traffic congestion / public transportation / pedestrian safety

- The 80 Flatbush Ave development site is located at one of the busiest crossroads in New York City. 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
- The addition of a loading dock on State Street near a public school entrance and the tower's residential entrance will compromise pedestrian safety.

- 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?
- Area traffic and public transportation are already congested, especially during events at the Barclay's Center. How will this project avoid making these issues untenable?
- Concerns about a large glass skyscraper that blocks both the low rise brownstone area and the views of OHP from the surrounding neighborhood.

Concerns about construction dust and soil contaminants that can be disrupted over an 8-year construction project.  
Such massive structures change the complexion of the neighborhood with no real coordinated approach at neighborhood and city planning.

#### Glare / Wind / Shadow impacts

- Structures of this size can have a substantial impact on the aerodynamics of an area. The corner of Flatbush and Hanson Place is already one of the windiest corners in Brooklyn and has been made more so with the addition of 300 Ashland and The Hub.
- The impact study needs to include an assessment of the potential impact of the change in wind patterns and potential impact on the surrounding neighborhood.
- Similarly, glare from glass towers affect light, heating, cooling etc. of nearby residences.
- The need for the expansion of the impact radius is necessary to fully address the potential impact of shadow, wind, and glare from a nearly 1,000 foot structure.

#### Public Green Space

- The neighborhood's limited green spaces are already congested and overused.
- Why is this project not offering any additional public space or green space like the public plaza recently opened at 300 Ashland?

#### Construction hours / noise / pollution / duration / vibrations / damage impact:

- During what hours / days of the week will construction take place?
- If the goal is to keep the Khalil Ghibran school open during the entire project, will that push construction hours to nights and weekends, further disrupting the residential neighborhoods?

- What steps is Alloy planning to take to mitigate construction noise, dust and other pollution that may be harmful to students, residents, tourists, etc.
- If the construction unearths lead, asbestos or other toxic substances in the demolition of buildings from the 1860s, what steps will Alloy take to notify the public and remediate?
- What is Alloy going to do to minimize the impact on the community of this project during an 8-year construction timeline? What compensation will be given to the neighborhood if the project goes over the projected timeline or fails in the middle?
- What measures will be taken to ensure the construction of such a large-scale project in a residential neighborhood does not inflict damage on the historic brownstones on State Street as well as the the landmarked Williamsburgh Savings Bank tower across the street? If damage is incurred, what compensation is Alloy prepared to offer area residents?

As of Right design:

What would an as of right building look like? (i.e. using the zoning the lots have the right to build without the zoning exceptions they are seeking)

Alloy and the ECF have not provided a design of what they would build with no zoning exceptions or other allowances.

Why is Alloy not offering to include schools, the ECF and cultural space in the project if they do not obtain the zoning exceptions they are requesting?

Alloy has used the threat of not providing any public benefit as the rationale to receive the zoning exceptions they are requesting. What would their project look like in an as or right design? They have yet to show any of these options to the community.

Thank you for your consideration on these comments.

We look forward to continuing a healthy public dialog as this project moves through the ULURP process.

Best Regards,

Ben Richardson

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Ben Richardson  
ben.richardson@gmail.com  
m: 917-708-0301

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**From:** Ben Richardson <ben.richardson@gmail.com>  
**Sent:** Monday, July 10, 2017 11:55 AM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** Response requested today: Cutoff time today for submitting comments?

Dear Ms. Maldonado,

I hope all is well. I know the deadline for submitting comments about the 80 Flatbush EIS draft scoping document is today, but is there a specific cutoff time by which they must be received?

The positive declaration scoping notice on your site does not specify a time, so presumably comments will be accepted through midnight EST, but I just wanted to confirm:

[http://schools.nyc.gov/NR/rdonlyres/4522ACD8-6FF2-4561-A650-B14A748D1A94/213945/80Flatbush\\_PositiveDeclaration.pdf](http://schools.nyc.gov/NR/rdonlyres/4522ACD8-6FF2-4561-A650-B14A748D1A94/213945/80Flatbush_PositiveDeclaration.pdf)

I appreciate your prompt response.

Best regards,

Ben

--

Ben Richardson  
[ben.richardson@gmail.com](mailto:ben.richardson@gmail.com)  
m: 917-708-0301

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**From:** kellie r <kelliography@yahoo.com>  
**Sent:** Thursday, July 27, 2017 4:24 PM  
**To:** Khalil Gibran 80 Flatbush  
**Cc:** ojonas@nysenate.gov  
**Subject:** 80 Flatbush

To whom it may concern,

I am a third generation Brooklynite.

I have watched my hometown change dramatically within the past ten years.

The level of development is astounding.

That being said, there is a profusion of high-rise luxury rentals congesting Downtown Brooklyn and its surrounding neighborhoods.

This is NOT what the community needs. We do NOT NEED MORE LUXURY HOUSING. We need AFFORDABLE and SUSTAINABLE housing. We need our EXISTING schools properly funded.

This plan - to build a monstrous skyscraper, forever changing the skyline of the borough - to flood the market with 700 LUXURY apartments is both ridiculous and insidious. By providing only a small percentage of affordable housing within the building, the developer is set to receive massive TAX BREAKS and incentives.

THIS IS NOT WHAT MY COMMUNITY NEEDS. AND WHY DOESN'T THE COMMUNITY HAVE THE ULTIMATE SAY IN THIS???

This plan is madness. I strongly oppose this development and will do everything I can to fight this monstrosity.

Kellie Rogers

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**From:** Norman Ryan <norman.ryan@eamdc.com>  
**Sent:** Monday, July 10, 2017 8:59 AM  
**To:** Khalil Gibran 80 Flatbush  
**Cc:** ojonas@nysenate.gov; Norman Ryan  
**Subject:** from NORMAN RYAN Re: 80 Flatbush Ave LLC

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 impact

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 anchor

S  
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

--

**Norman D. Ryan**

Vice President – Composers & Repertoire

**Schott Music Corp | EAMDC**

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<http://www.eamdc.com>

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**From:** Karen A. Saah <kasaah@yahoo.com>  
**Sent:** Monday, July 10, 2017 1:19 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** COMMENTS FOR 80 FLATBUSH

**Jennifer Maldonado, Executive Director**  
**New York City Educational Construction Fund**  
**30-30 Thomson Avenue, Fourth Floor**  
**Long Island City, NY 11101**

Dear Ms. Maldonado,

My husband is an original owner of a condo in 1 Hanson Place and we collectively have lived in Fort Greene almost 15 years. We love the neighborhood and, in many ways, we are excited and thrilled about the tremendous change the area that is bringing in new residents and commercial services. However, we are deeply concerned about the scale of and number of zoning waivers requested for 80 Flatbush. The impact of the proposed megastructure on the surrounding area and the residents of this historic community is potentially devastating. I would like to add my voice to the large number of residents that would like to see this proposed development studied carefully and thoroughly in order to gain new housing and other services while also protecting the aspects of the neighborhood that are essential and necessary for its continued livability for all those in the community.

In particular, I would ask that the following considerations be added to the proposed Environmental Impact Study (EIS):

1. Expand the study area to one half mile to better reflect the historic neighborhood and change that has taken place recently, including the construction of no less than six (6) new apartment towers within a five (5) block radius.
2. Include review by the Landmarks Preservation Commission with respect to designated landmarks including 1 Hanson Place and the historic Fort Greene neighborhood.
3. Include a clear justification for the waiver of height and setback regulations especially for the 38 story phase 1 tower which is "flatiron" like in shape. The precedent of the Flatiron Building in Manhattan is completely inappropriate for this development parcel. Height and setback regulations preserving access to daylight and sky are critical.
4. Include an economic justification for the need for such a radical increase in FAR. This increase is unsupported by the relative scale and density of the surrounding neighborhood. There is no existing infrastructure such as subway entrances, adequate roadways, or pedestrian crossings to support such an increased FAR nor is there precedent in Fort Greene for a development of this scale.

Please also note, that while the rebuilding of an existing school (with no additional seats) and the addition of a single school are both positive and important, those projects alone do not justify the extensive zoning waivers necessary to build a development that overshadows every other building in a several block radius, strains the surrounding infrastructure in a way that will make life in the neighborhood untenable, and places an outsized structure in our beloved neighborhood that is more incongruous than any other development that Brooklyn has ever seen.

Thank you in advance for your consideration of these important issues with respect to the proposed 80 Flatbush development.

Sincerely,  
Karen Saah and Mark Price

Owners at 1 Hanson Place

↓

Hello,

My name is Cynthia Salett.  
I live on the 400 block of  
State St. I am a parent of  
a 7 yr. old who attends  
public school.

Today, I want to speak  
about the affect of this  
project on our public school system.  
I am deeply, profoundly against  
this project. It is a tremendously  
bad deal for parents and children  
of both districts 15 and 13.  
The math just doesn't add up!  
900 new living units in  
exchange for 1 gym, 1 auditorium  
and 1/2 of an elementary school.  
I am not alone in feeling that  
Brooklyn parents are getting a  
aw deal. I have spoken with  
representatives of P.S. 261, P.S. 133,  
P.S. 38, P.S. 29, and P.S. 321.

Every parent I have spoken with is shocked and dismayed at the prospect of more increases in already over-crowded schools this project will bring. We need schools, but NOT attached to giant buildings that bring 900 new living units! This will completely nullify 325 seats! If even a fraction of these 900 units contain families with 2 children the 1/2 elementary school you propose will not even satisfy the needs of your one development. It certainly will not alleviate the over-crowding that already exists. Are we to see the deficit of seats for children entering high school extend to middle and elementary schools due to these type of deals! 290 of children in NYC do not

have a seat in High School. 1  
6%! This project is hurting  
that ratio, not helping it.  
This is a very bad deal for  
Brooklyn. We need schools  
NOT World Trade Center style  
glass towers.

In addition this is a  
terrible location for an  
elementary school. These are  
children 4-10! Flatbush is  
one of our busiest, noisiest and  
most dangerous streets. I have  
witnessed people hit by cars  
at 3<sup>rd</sup> Ave and Flatbush. This  
is no place for children to  
learn in a safe, quiet environment.  
All of our Brooklyn schools (primary)  
are tucked into safe, quiet  
streets with little traffic, noise  
and car exhaust. I cannot  
imagine why this block  
would even be considered for

Such young children. ' ' /

I would never send my son to a school like this.

This is why I would ask for an immediate NO to any building above the height restrictions as they now stand.

Also, I believe there should be a postponement to this decision until the entire community has a chance to be informed! Alloy has been working on this for at least a year, in secret! Hiring expensive lawyers and PR people. We were only informed in April. Most of the people I have spoken with knew nothing about it! Even this meeting today was scheduled for the last day of public school! making it very difficult



----- Forwarded message -----

From: Cynthia Salett <[cynthiasalett@gmail.com](mailto:cynthiasalett@gmail.com)>

To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>

Cc:

Bcc:

Date: Mon, 24 Jul 2017 16:53:34 +0000

Subject: Re: public scoping comments

To Jennifer Maldonado

Executive Director

New York City Educational Construction Fund

Dear Ms. Maldonado,

I am writing to you to share my concern about the proposed 80 Flatbush project in Boerum Hill, Brooklyn.

I am deeply opposed to this project on many levels. My understanding of the ECF, while limited, is that this is an organization put in place to address the really needs New Yorkers have for additional school seats. I believe this organization to be very valuable. But, this project, 80 Flatbush will not meet this goal. The addition of a 350 seat elementary school, is not an adequate trade off for the increase in children a 900 unit project will cause. I request that an additional study be conducted to determine exactly how many more children will be added to Boerum Hill as a result of these proposed 900 units. This way we all have a real picture of the affect on neighboring schools this project will have.

I also want to address the needs of Kalil Gibran. This school most certainly needs a renovation. When I attended the public scoping meeting I understood that Alloy would only be providing a new gym and auditorium. I now understand that Kalil Gibran's needs are much greater. While I feel that this need must be meet, I do believe that Alloy's plan is taking advantage of this great need to force their oversized project on the community and the ECF. Instead of allowing Alloy to place golden handcuffs on, I would like to propose a different approach to renovating Kalil Gibran. I have access to various fundraising organizations and I am willing to discuss this with you in person if you prefer. I believe that we may be able to find funding for Kalil Gibran to renovate the building without Alloy. Please consider an alternative to Alloy's plan for Kalil Gibran's improvement.

I would also like to request a Study Area of one half mile instead of 400 feet. There is a tremendous amount of new residential units being added to this neighborhood, especially on Schermerhorn. The impact of all of these projects must be considered within the context of a proposed project of this magnitude. The resulting increase in traffic, both foot and car, garbage removal, sewer stresses, noise and pollution must be considered in the larger context of the changes to our city of Brooklyn. To consider any of these projects as if they are happening in a bubble is doing a disservice to our communities. We need to focus more on the concept of urban planning and not on single projects.

I would also like to request a specific study on how this project will affect response times for the fire department, engine #226. This is so very important to the safety of all our neighbors. A comparison of current response times as opposed to response times with the addition of this project within the one half mile zone will help to illuminate the real impact of this development. This is especially important during construction and staging phases which will last for many, many years. We need to make sure we are not putting Brooklynites at risk for such a small gain in school seats.

I would also like to request a shadow, wind and reflection study, again in a one half mile radius. We already have a tremendous wind tunnel problem at the corner of Atlantic and 4th Avenue. I can only imagine how much worse it will be with the addition of a building the size of the Chrysler building.

I would also like to ask you to study the increase of traffic on both 3rd Avenue, State Street and Schermerhorn, especially if the Schermerhorn extension is removed. Please take into consideration the impact of a loading dock for this gigantic building on both 3rd Avenue and State Street. Please consider as well the impact of school bus loading and unloading. Where would this happen and how would it affect traffic on State and 3rd Avenue.

I would also like you to study the impact on our homes and quality of life that a project of this size will have, with specific focus on vibration during the construction phase, increase in rodent infestations and harmful dust and debris. Most importantly, noise. It is my understanding that many after hour variances will be needed for this project since Kalil Gibran will remain open during construction. I certainly do not want to see the children of Kalil Gibran negatively impacted due to the high level of noise this project will cause. But what about our children and their quality of sleep? How are our children going to be prepared for their school day if intense amounts of incessant noise drone on night after night? Are you going to take this into account? Are the children of Kalil Gibran more important than our children? When The Hub building was constructed, and it is a good 20 stories smaller, our family experienced many an early morning awoken by noise created due to the issuance of after hour variances this project received from the city. If Alloy must do most of it's work primarily after hours the impact on our quality of life will be unendurable. Please study what the real affect of construction and

staging on the residents of State Street, Flatbush, Schermerhorn, Atlantic and all other surrounding blocks that will hear the late night pounding. If we are forced to move out of our home during the building of the 74 story tower, will the city be willing to compensate us for the expense? If our child suffers mentally from sleepless nights due to constant noise, will the city take responsibility for his injuries? Please take this all into account.

Finally, I hope that you can see what a bad deal this project is for Boerum Hill. I know the Chamber of Commerce endorses this project since it will increase office space, but we have a tremendous amount of new construction already in progress that will give downtown Brooklyn ample new office space. We also have a huge increase in affordable housing units with all the other projects already in progress. How much is enough? How much density is enough? Do we want to be like Beijing? I know that I do not want to see that happen to New York. I do not want to see bad air quality and over crowding become the norm. Please consider another alternative to green-lighting this project. We can do better for our children and our community.

Thank you so much,  
Cynthia Salett  
476 1/2 State Street  
Brooklyn, New York

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Hello - my name is Peter Salett and I live on the 400 block of State St and I'm here to express my opposition to the 80 Flatbush project.

My main point in opposing this project is that this construction and this development has nothing in common with our neighborhood.

That means architecturally - this proposed 72 story glass mega tower on a residential brownstone street, State St. which is frankly an ode to the oversized egos of the developers, looks nothing like any other structures in the area. It would dwarf the beloved clock tower building and change the skyline of Brooklyn forever. There are no buildings this tall in the West Village, the East Village, the upper west side or the upper east side. Is this residential area to be transformed into midtown Manhattan?

The placement of these buildings also has no thought for the neighborhood and the people that actually live here. A loading dock on 3rd Avenue? anyone who lives around here will tell you 3rd Ave is already completely congested, with traffic backing up 20 blocks or more during peak hours. ~~That's a terrible idea.~~ The EIS needs to be broadened to beyond simply Atlantic Ave. Union St. should be the border for impact, and Smith St. School busses stopping on State St? We don't even have a city bus on State street like buses that use Dean and Bergen and Livingston - why? Because this is a tiny residential street.

I get it. The developers smartly figured out a way to own this valuable land and are using the pretext of building 1/2 a school and an auditorium to try to make as much money as possible, and flaunt their design skills. They won't be living here for the 8 years

of proposed construction and the nightmarish noise and traffic and rats that it will bring. They don't care about our property values being negatively impacted, about the shadows the buildings will cast throughout the neighborhood. And that's their right.

But can't we, as a Brooklyn community, come together to say enough, to say that the value of being in Brooklyn is distinct from being simply Midtown Manhattan lite,

and that the neighborhoods and arts and unique cultures of Brooklyn are what give it its value, not its towers. Can't we as a community figure out a way to provide Khalil Gibran an outdoor area and an auditorium without negatively impacting all of our residents? All of this construction is bringing thousands of new residents into our area - can't we as a community figure out how to preserve some buildings that will be dedicated for schools?

This process has clearly been purposefully and smartly been maneuvered so that the people of the area won't have time to amply respond. I know that I speak for the vast majority of people in our area when I say that we, as a community, would like to rethink how this land is to be used.

Thank you for your time.

From: Peter Salett <petersalett@gmail.com>  
To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>  
Cc:  
Bcc:  
Date: Mon, 10 Jul 2017 21:25:50 +0000  
Subject: Comment for 80 Flatbush project  
Hello - my name is Peter Salett and I live on the 400 block of State St and I'm here to express my opposition to the 80 Flatbush project.

My main point in opposing this project is that this construction and this development has nothing in common with our neighborhood.

That means architecturally - this proposed 72 story glass mega tower on a residential brownstone street, State St. which is frankly an ode to the oversized egos of the developers, looks nothing like any other structures in the area. It would dwarf the beloved clock tower building and change the skyline of Brooklyn forever. There are no buildings this tall in the West Village, the East Village, the upper west side or the upper east side. Is this residential area to be transformed into midtown Manhattan?

The placement of these buildings also has no thought for the neighborhood and the people that actually live here. A loading dock on 3rd Avenue? Anyone who lives around here will tell you 3rd Ave is already completely congested, with traffic backing up 20 blocks or more during peak hours. The area of scoping needs to be widened considerably - to Union St. to the south and Smith St. to the east.

School busses stopping on State St? We don't even have a city bus on State street like the buses that use Dean and Bergen and Livingston - why? Because this is a tiny residential street. I'd like to know if there are any other towers above 70 stories that have 3 story brownstone residences on the opposite side of the street. Both facing State St. and facing 3rd Ave the tower will be opposite 3 story residences. Does this exist anywhere else in New York City?

I get it. The developers smartly figured out a way to own this valuable land and are using the pretext of building 1/2 a school and an auditorium to try to make as much money as possible, and flaunt their design skills. They won't be living here for the 8 years of proposed construction and the nightmarish noise and traffic and rats that it will bring. They don't care about our property values being negatively impacted, about the shadows the buildings will cast throughout the neighborhood. And that's their right.

But can't we, as a Brooklyn community, come together to say enough, to say that the value of being in Brooklyn is distinct from being simply Midtown Manhattan lite, and that the neighborhoods and arts and unique cultures of Brooklyn are what give it its value, not its towers. Can't we as a community figure out a way to provide Khalil Gibran an outdoor area and an auditorium and proper electricity without negatively impacting all of our residents?

All of this construction is bringing thousands of new residents into our area - can't we as a community figure out how to preserve some buildings that will be dedicated for schools? With so much other new construction in this specific area - aren't we already fulfilling our need to office space and low income housing and arts projects? The area of scoping needs to include a much wider area in order to fully recognize the tremendous amount of construction that has been recently completed and / or is in process.

This process has clearly been purposefully and smartly been maneuvered so that the people of the area won't have time to amply respond. In the presentation on June 28th, there was a slide that mentioned "stakeholders" being informed of this project in 2016. And yet the people of the neighborhood were not told of this until this April. Are we not "stakeholders" in this process?

I know that I speak for the vast majority of people in our area when I say that we, as a community, would like to rethink how this land is to be used, and be given more time to come up with a solution.

Thank you for your time.

**ECF 80 Flatbush Avenue**

*Draft Scope of Work for an Environmental Impact Statement*

**COMMENT SHEET**

**NAME:** BRIAR SAURO

**ADDRESS:** 560 State St #5B

**E-MAIL:** bsawg@yahoo.com

**COMMENTS:**

I am concerned about the height and number of apartments. State St is a block of small brownstones. The height will be outrageous. I live across the street.

My building has a courtyard that adds tremendously to our property value and I am concerned about shadows reducing its enjoyable use.

Parking is already impossible. School + loading zones will make worse.

Will there be any spots left in the new school after 900 APARTMENTS are built there?

Please be sure to study the effects <sup>shadow</sup> on the 560 STATE STREET COURTYARD

**Comments must be received by Monday, July 10, 2017.**

Your comments may be submitted in person at tonight's meeting or by mail/email to:

Jennifer Maldonado  
Executive Director  
New York City Educational Construction Fund  
30-30 Thomson Avenue, 4th Floor  
Long Island City, NY 11101  
Email: KhalilGibran80Flatbush@schools.nyc.gov

To:

July 17, 2017

Jennifer Maldonado  
Educational Construction Fund  
30-30 Thomson Avenue, Fourth Fl.  
Long Island City, NY 11101

Dear Ms. Maldonado,

I'm a long-time resident of Boerum Hill in Brooklyn and read with shock about the hideous apartment towers proposed developers are proposing to build in my neighborhood, and to which the Education Construction Fund is considering approving, because the developers promise to include a new school in the project to replace the current Khalil Gibran School, which is now in a deteriorating building.

First, this neighborhood and adjacent brownstone neighborhoods are already suffering from the new additions of inappropriate gigantic towers that cast shadows on the neighboring homes and backyards. These luxury apartments do not offer housing to middle-income families who are being displaced and driven out. We have steadily been losing the mom-and-pop shops that provide basic services. Much of the appeal of Boerum Hill is the rows of two- and three-family homes where middle-income people can raise families in quiet leafy surroundings. These high-rise apartment towers — 900 units ~ will blot out our sky and add nothing to the neighborhood except crowding of services we're not preparing for.

Second, our transit system is already dangerously crowded and crumbling. The situation is desperate, needed repairs will make it worse and this project proposes bringing around 2,000 more people into the area! What provisions are being made to the infrastructure of our neighborhood to handle this? What happens to parking, already difficult to find, as the Citi bike racks have removed great stretches of parking space around here? (I don't own a car myself but many of my neighbors do.)

As to the proposed new school, do you have any idea of the pace of construction of these new projects? Look at Barclay Center, at the abandoned L.I. rails where new middle-income apartments were promised to the city by the developers TEN YEARS ago. The families on the waiting list are still waiting. You can be sure, the hideous apartment towers, will be built quickly while the Khalil Gibran School will wait and wait.

If you need any more convincing of how these sky-high apartment towers are ruining Brooklyn, go over to where the Brooklyn Academy of Music, a arts destination for residents and tourists, stands in Fort Greene. Once the historical building stood out like a beacon when I walked there to see a film or play. Now it is barely visible from the western side, hidden behind several of the largest and ugliest apartment buildings I've ever seen.

By the way, I've read that one of those ugly buildings is having trouble finding buyers for the luxury apartments and is offering discounts. We need housing for the working- and middle-class, not luxury units for investments for the super-wealthy.

cc: JoAnne Simon, Steve Levin

*Yours truly,*  
*Marcia Savin*  
MARCIA SAVIN

From: VITERI, HELENA <[HVITERI@nycsca.org](mailto:HVITERI@nycsca.org)>

Sent: Wednesday, July 19, 2017 3:42:58 PM

To: Maldonado Jennifer

Cc: WONG, CYNTHIA

Subject: Letter from resident of Boerum Hill Marcia Savin

Jennifer, please see attached letter from resident of Boerum Hill in Brooklyn. Ms. Savin's address is 245 Smith Street, Brooklyn, NY 11231 (got from envelope, not included in letter).

Helena

----- Forwarded message -----

From: Richard Schaedle <richbrkln@msn.com>

To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>

Cc:

Bcc:

Date: Fri, 28 Jul 2017 20:59:33 +0000

Subject: 80 Flatbush Scoping

This development is completely inappropriate for the boerum hill neighborhood. I am a homeowner at 180 Dean Street and we have suffered enough overcrowding and building in the last 10 years. This is a violation of transitional zoning and is out of context to the neighborhood. It's a giveaway to the developer. The school can be properly sited without tying it to this development.

Richard schaedle

Miriam Velez

Sent from my iPhone

---

**From:** Alan Seales <alanseales@gmail.com>  
**Sent:** Friday, July 28, 2017 3:37 PM  
**To:** Khalil Gibran 80 Flatbush  
**Cc:** Kristal Seales  
**Subject:** Feedback on 80 Flatbush proposed development

To Whom It May Concern:

We are current residents on State Street, directly across from the proposed new development being called 80 Flatbush. We have numerous concerns both about the construction and resulting changes it will bring to the community and local quality of life. We understand the benefits it also brings to the neighborhood, and so want to be somewhat accommodating as long as our concerns are heard and our requests for mitigating these concerns implemented.

Key concerns / requests to help mitigate concerns:

- Construction can cause underlying damage to the land and neighboring buildings
  - Indemnify the block from damages to our property for at least 10 years
- Demolition and construction will take at least 6-7 years, which will be noisy and dirty
  - Provide new soundproof windows to those buildings facing the construction site
  - Shorten the construction time if possible
  - No construction on weekends or past 7pm, when our small children start their bedtime routines
- The second tall residential / commercial tower proposed, is significantly higher than all surrounding buildings, which will block out sunlight to our street. This development is located in Boerum Hill, not downtown, therefore this density is excessive.
  - Shorten the taller tower to a more appropriate level, adhering to current zoning restrictions. As a reminder, locating the tallest tower in Brooklyn next to low-rise residential buildings is a violation of transitional zoning and design context
- Increased vehicular traffic due to the school entrance (buses), loading dock (trucks), and proposed residential parking deck, which will undoubtedly eliminate the existing street parking on the 500 block and make the intersection of State St and Flatbush Ave even more difficult
  - Give us first right of refusal on a dedicated parking spot in a new parking facility in the development or pay for parking at a neighboring lot
  - Move the permanent loading dock for the building to 3<sup>rd</sup> Ave once the school has moved into their new building
  - Ensure that the Commercial entrance is on Flatbush or 3<sup>rd</sup> Ave and not State St
  - State St should only contain the entrance to the Elementary School and a private, secondary residential entrance for the shorter tower
  - Evaluate the existing traffic congestion at the end of State St leading into Flatbush Ave and 4th Ave, potentially adding a light and modifying traffic patterns as necessary
- Increased foot traffic and constant deliveries will lead to increased litter on our street
  - Provide clean-up to our stoops and front yard on a daily basis
  - Mandate that the building cannot leave trash outside the building, unless it is right before pick-up and in rodent-safe bags. There is already a rat issue on the block
- The building will increase strain on already capacity constrained local resources, such as subways, restaurants, etc.
  - Enlarge the environmental impact study beyond the originally proposed 400 feet
  - Include a restaurant in the retail segment of the building
  - For a more accurate and informed study, the EIS should include drawings and elevations of the No Action plan as well as a comparison elevation of heights of all buildings over 12-stories in the study area.
- For the headache and hassle of enduring the construction as well as altering the community, give the block free access to all the amenities in the proposed development, including playground access, gym access, etc.
  - The development does not include any open space for the community. While green space is shown on the roofs of the schools, they are small and may not be accessible to the public.
- We also request that, not only for us but for the benefit of your prospective commercial and residential tenants, you work with Verizon to pay for and bring FIOS to the block, making sure it be made available for those of us on the 500 block that want to switch away from Spectrum. As a far superior high speed internet technology, being able to boast that FIOS is available would greatly improve your investment into the block.

We do realize the benefit the new development can bring to the neighborhood, but want to ensure that the feel on State Street stays vibrant yet charming, and not overrun by commercialization and literal trash. We welcome the schools and the affordable housing but not if it overwhelms our neighborhood.

Thank you,

Kristal and Alan Seales  
538 State St., Brooklyn, NY 11217  
919-264-8493

From: "julie julie ssey-booonyyaaa!" <juliemurry@gmail.com>  
To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>

Cc:

Bcc:

Date: Fri, 7 Jul 2017 12:26:32 +0000

Subject: Alloy Development's 80 Flatbush

Hello,

I live at One Hanson Place and we are totally AGAINST the Alloy's 80 Flatbush proposal. It is too tall and will shadow too much of our beautiful city.

This is a poorly thought out plan.

Do let developers take over from regular people.

Thanks

Julie Sebunya

917-586-2657

--

<http://fundraise.worldbicyclerelief.org/EliasKabuye>

\$25 puts a set of wheels in the field and \$147 a full bicycle

<http://fundraise.worldbicyclerelief.org/timothy-sebunya>

---

**From:** Doug Shapiro <dtshapiro1@gmail.com>  
**Sent:** Friday, July 28, 2017 8:26 AM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** Comments on 80 Flatbush

This building is TOO TALL. Will bring too much traffic and congestion to the already over-stressed intersections of Flatbush/Atlantic/3rd ave/4th ave, which are nightmares for pedestrians and cars alike.

We want a human-scaled city. Enough of these insanely tall, out of scale buildings that take our commonly shared light, air, and views and gives them over to private individuals.

I appreciate the work around for the school and historic buildings but Please bring this tower down a dozen or two dozen stories, and you will find much more support in the neighborhood for a project that will deserve it.

From: Adam Shott <adam\_shott@yahoo.com>  
To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>  
Cc:  
Bcc:  
Date: Mon, 10 Jul 2017 20:51:31 +0000  
Subject: 80 Flatbush Concerns  
ATTN:  
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

Dear Ms. Maldonado,

I am a resident of Fort Greene and have seen the area go through tremendous change. However, I find the proposed project at 80 Flatbush is requesting several waivers that require very careful study. The approval of said waivers would, I believe, adversely impact the surrounding area and are unnecessary for the positive and financially successful development of this parcel.

Items that should be studied as part of the EIS include:

- Expansion of the study area from the 400 feet in the proposal to one half mile to better reflect the historic neighborhood and change that has taken place recently. This will also take into consideration the impact of the development on traffic, noise, water and sewer load, air quality, transit, parking, pedestrian safety and other quality of life issues.
- Inclusion of a review by the Landmarks Preservation Commission with respect to designated landmarks including The Williamsburg Savings Bank Building and the historic Fort Greene neighborhood.
- Clear justification for the waiver of height and setback regulations especially for the 38-story phase 1 tower, which is "flatiron" like in shape. The precedent of the Flatiron Building is completely inappropriate for this development parcel. That building was built prior to zoning regulations. Height and setback regulations preserving access to daylight and sky are crucial and should not be dismissed lightly. I see no reason why this project merits such a waiver.
- Economic justification for the need for such a radical increase in FAR. This increase is unsupported by the relative scale and density of the surroundings. A 90-story building such as this would be more appropriate only in the densest parts of Manhattan and even then would be rare. There is no existing infrastructure to support such an increase nor is there precedent in the surroundings for anything even remotely approaching this level of development.

While the rebuilding of a school and the addition of a new school are certainly needed, to my view these benefits do not sufficiently justify the waiving of zoning regulations that were carefully designed and considered only relatively recently. In addition a study is needed to determine how many school age children will result from 900 housing units and how the city will address even the current seating deficit.

In closing, I feel that this development needs to be tailored to provide an economically viable benefit to the neighborhood.

Thank you,

Adam Shott  
256 Adelphi St  
Brooklyn, NY 11205  
adam\_shott@yahoo.com

Alexandra Solomon Siegel  
1 Hanson Place, Apt 15L  
Brooklyn, NY 11243  
alexandrasolomon@gmail.com

July 7, 2017

VIA EMAIL AND US MAIL

Jennifer Maldonado  
Executive Director  
New York City Educational Construction Fund  
30-30 Thompson Avenue, 4th Floor  
Long Island City, New York, 11101  
KhalilGibran80Flatbush@schools.nyc.gov

Re: 80 Flatbush Avenue Project / Alloy Development

Dear Ms. Maldonado:

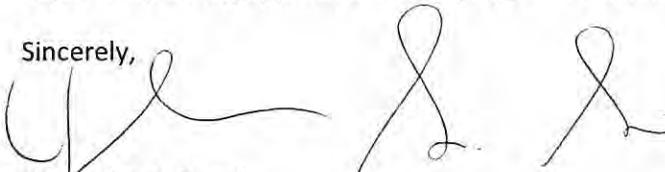
I am writing to express significant concerns about the proposed development at 80 Flatbush Avenue. I am not opposed to new development and of course am in favor of new schools. However, a change in zoning to allow 3x the current allowable FAR seems ill-conceived. At the very least, it is worthy of significant additional study and neighborhood/transit impact planning so that we do not create a host of new problems in the effort to fulfill the need for new school facilities.

I believe the proposed project would add too much bulk and too much incremental traffic to the area (in addition to public transportation impact). Existing congestion already threatens pedestrian safety and the neighborhood does not have enough green space as is.

Moreover, my understanding is that Alloy does not have any experience building a project of this magnitude. The potential for failure feels like a big risk to take with this site. We could end up with an incomplete project and various other adverse impacts if design and construction are not properly vetted and managed.

I do not feel there has been nearly enough study to grant any change in zoning and I must therefore express my strong opposition to the project as currently conceived.

Sincerely,

A handwritten signature in black ink, appearing to be 'Alexandra S. Siegel', written in a cursive style.

Alexandra S. Siegel  
Neighborhood Resident

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**From:** Alexandra Solomon Siegel <alexandrasolomon@gmail.com>  
**Sent:** Monday, July 10, 2017 1:34 PM  
**To:** Khalil Gibran 80 Flatbush  
**Cc:** simonj@nyassembly.gov; slevin@council.nyc.gov; ojonas@nysenate.gov  
**Subject:** 80 Flatbush || Please See Attached  
**Attachments:** Letter re 80 Flatbush.pdf

Dear Ms. Maldonado:

Please see attached letter regarding 80 Flatbush Ave.

Sincerely,  
Alexandra S. Siegel

Alexandra S. Siegel  
917-974-2418 (m)

Alexandra Solomon Siegel  
1 Hanson Place, Apt 15L  
Brooklyn, NY 11243  
alexandrasolomon@gmail.com

July 7, 2017

VIA EMAIL AND US MAIL

Jennifer Maldonado  
Executive Director  
New York City Educational Construction Fund  
30-30 Thompson Avenue, 4th Floor  
Long Island City, New York, 11101  
KhalilGibran80Flatbush@schools.nyc.gov

Re: 80 Flatbush Avenue Project / Alloy Development

Dear Ms. Maldonado:

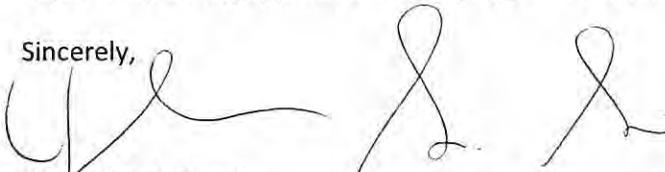
I am writing to express significant concerns about the proposed development at 80 Flatbush Avenue. I am not opposed to new development and of course am in favor of new schools. However, a change in zoning to allow 3x the current allowable FAR seems ill-conceived. At the very least, it is worthy of significant additional study and neighborhood/transit impact planning so that we do not create a host of new problems in the effort to fulfill the need for new school facilities.

I believe the proposed project would add too much bulk and too much incremental traffic to the area (in addition to public transportation impact). Existing congestion already threatens pedestrian safety and the neighborhood does not have enough green space as is.

Moreover, my understanding is that Alloy does not have any experience building a project of this magnitude. The potential for failure feels like a big risk to take with this site. We could end up with an incomplete project and various other adverse impacts if design and construction are not properly vetted and managed.

I do not feel there has been nearly enough study to grant any change in zoning and I must therefore express my strong opposition to the project as currently conceived.

Sincerely,

A handwritten signature in black ink, appearing to be 'Alexandra S. Siegel', written in a cursive style.

Alexandra S. Siegel  
Neighborhood Resident

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From: Dwight Smith [mailto:dwrightsmith@verizon.net]  
Sent: Thursday, July 06, 2017 11:55 AM  
To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>  
Subject: 80 Flatbush

Ms. Jennifer Maldonado, Executive Director  
New York City Educational Construction Fund  
30-30 Thomson Avenue, Fourth Floor  
Long Island, NY 11101

RE: 80 Flatbush Avenue Draft Environmental Impact Statement Scope of Work

Ms. Maldonado,

Having reviewed the draft EIS and listened to Alloy's CEO pitch, the EIS has to confirm the school seat benefit of undertaking this proposed ECF project. Additionally the scope needs to be broadened. In my view, the EIS needs to:

- Analyze how the number of proposed school seats to be built will add additional capacity at the primary school level once all 922 units are occupied and the number of school age children estimated.
  - What is the total number of school age children estimated the project will produce?
  - With the addition of these school children, will the number of unfunded seats increase or decrease? Decrease means in the context of this project that the number of school seats built by Alloy will reduce overcapacity in CSD 15 and the total number of unfunded seats in the district after it has absorbed the new students created by the project. If it will reduce overcapacity, by what number of seats?
- Expand study area from 400' to one-half mile to more realistically assess project impact.
- Estimate the total number of residents generated by this project; assess their additional impact on open space requirements in an area with an existing open space deficit.
- Assess glare impact from glass tower.
- Assess light, air, air quality impact from project.
- Assess wind-noise impact from towers.
- Assess impact on Atlantic Ave subway station capacity and safety.

- Assess impact on sidewalk capacity along State Street and Flatbush, pedestrian flow and safety at key intersections.
- Assess impact on water/sewer load in study area.
- Assess impact of XX new residents on the quality of life of the current residents of this brownstone neighborhood.

Respectfully,

Dwight Smith

88 Wyckoff Street

Boerum Hill

---

**From:** Gabriel Snyder <gs@gabrielsnyder.com>  
**Sent:** Monday, July 10, 2017 2:59 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 Flatbush Avenue Scoping Comments

To: Jennifer Maldonado, Executive Director New York City Educational Construction Fund

I am writing as a concerned resident of the area near the 80 Flatbush. Given the size of the development project and the magnitude of the impacts on the surrounding area, I would like to request that the scoping study area be expanded to half a mile from its current 400-foot zone. I live at Nevins and State, outside the 400-foot boundary, but I foresee major impacts on traffic, noise, parking, and light at my residence.

Some specific questions I have:

- Nevins has already become increasingly congested with traffic as it serves as the main conduit of southbound traffic from Flatbush (it is the first left hand turn from the Manhattan Bridge) to Boerum Hill, Cobble Hill, Carroll Gardens, Gowanus and other neighborhoods south. This has lead to noise and pollution from cars (and many tour buses) idling at stoplights. How will this project impact weekday traffic on Nevins between Flatbush and Atlantic? Will it lead to more pollution from idling buses? What will the noise impact be for apartments facing Nevins?
- How will the shadow path affect the nearby area?
- Will current public transit (buses and subways) be adequate to accommodate the additional residents, school students, and business customers the new project will bring to the area?

Thank you for considering these requests.

Sincerely,  
Gabriel Snyder  
454 State St.

----- Forwarded message -----

From: iris spellings <optu.ny@gmail.com>

To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>

Cc:

Bcc:

Date: Fri, 28 Jul 2017 20:59:53 +0000

Subject: Alloy Development Project

28 July 2017

Jennifer Maldonado, Executive Director  
New York City Educational Construction Fund  
3030-Thomson Avenue, Fourth Floor  
Long Island City, NY 11101

Dear Ms. Jennifer Maldonado:

Boerum Hill is a small historic neighborhood in Brooklyn. I wish to appeal to your commonsense in this letter. Alloy Development's proposed project of huge twin towers is gravely and grossly out of place in Boerum Hill.

Bulldozing old schools and building luxury high-rises in their place as long as the buildings include new classrooms is a dazzling promise and not enough of a guarantee that it is good for the community. We've been through this before. Developers promise much to improve the neighborhood and once give the okay to proceed, the community comes up short in real life day-to-day amenities and even more negatively impacted by overdevelopment.

Recognizing the massive building going on in the downtown area at this time,—and yes, there is a need for schools—is still no excuse to okay this project without a proper Environmental Impact Study! 400 feet is inadequate to study all the indirect impacts...a half-mile radius minimum is needed.

This development is proposed for Boerum Hill and not downtown, therefore, the density is excessive. Also, locating the tallest tower in Brooklyn next to low-rise residential buildings is a violation of transitional zoning and design context.

A more accurate and informed study should include drawings and elevations of the No Action plan, as well as a comparison elevation of heights of all buildings over 12-stories in the study area.

Additionally the development does not include any open space for the community. The green space proposed on the roofs of the schools, are small and, may not be accessible to the public.

We truly welcome the schools and the affordable housing, only not at the expense of overwhelming our neighborhood.

I speak for both my husband and myself, who are business owners and residents of this community for 35 years.

Sincerely,

Iris Spellings  
Art Spellings  
321 Dean St.  
Brooklyn, NY 11217

**Jennifer Maldonado, Executive Director**  
**New York City Educational Construction Fund**  
[30-30 Thomson Avenue, Fourth Floor](#)  
[Long Island City, NY 11101](#)  
[KhaliilGibran80Flatbush@schools.nyc.gov](mailto:KhaliilGibran80Flatbush@schools.nyc.gov)

Dear Ms. Maldonado,

I am a resident of Fort Greene and have seen the area go through tremendous change. However, I find the proposed project at 80 Flatbush is requesting several waivers that require very careful study. The approval of said waivers would, I believe, adversely impact the surrounding area and are unnecessary for the positive and financially successful development of this parcel.  
Items that should be studied as part of the EIS include:

- Expansion of the study area from the 400 feet in the proposal to one half mile to better reflect the historic neighborhood and change that has taken place recently. This will also take into consideration the impact of the development on traffic, noise, water and sewer load, air quality, transit, parking, pedestrian safety and other quality of life issues.
- Inclusion of a review by the Landmarks Preservation Commission with respect to designated landmarks including The Williamsburg Savings Bank Building and the historic Fort Greene neighborhood.
- Clear justification for the waiver of height and setback regulations especially for the 38-story phase 1 tower, which is "flatiron" like in shape. The precedent of the Flatiron Building is completely inappropriate for this development parcel. That building was built prior to zoning regulations. Height and setback regulations preserving access to daylight and sky are crucial and should not be dismissed lightly. I see no reason why this project merits such a waiver.
- Economic justification for the need for such a radical increase in FAR. This increase is unsupported by the relative scale and density of the surroundings. A 90-story building such as this would be more appropriate only in the densest parts of Manhattan and even then would be rare. There is no existing infrastructure to support such an increase nor is there precedent in the surroundings for anything even remotely approaching this level of development.

While the rebuilding of a school and the addition of a new school are certainly needed, to my view these benefits do not sufficiently justify the waiving of zoning regulations that were carefully designed and considered only relatively recently.  
In addition a study is needed to determine how many school age children will result from 900 housing units and how the city will address even the current seating deficit.

In closing, I feel that this development needs to be tailored to provide an economically viable benefit to the neighborhood.

Thank you,

Susan Spiller  
One Hanson Place #16BC  
Brooklyn, NY 11243  
[sznspiller@yahoo.com](mailto:sznspiller@yahoo.com)  
646-369-8241

----- Forwarded message -----

From: patricia stegman <patriciastegman@earthlink.net>

To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>

Cc:

Bcc:

Date: Fri, 28 Jul 2017 20:59:32 +0000

Subject: 80 Flatbush Avenue, Brooklyn

Jennifer Maldonado, Executive Director;

NYCity Educational Construction Fund

30-30 Thomson Avenue 4th floor

Long Island City, NY 11101

The development projected is inappropriate for many reasons for this site.

First of all; the designation is incorrect; this is not in “downtown Brooklyn”; it is in Boerum Hill; a district

which is a part of the Brownstone Belt; which includes Brooklyn Heights; Park Slope; Cobble Hill; and Boerum Hill. This enormous tower is not appropriate for a 19th century townhouse district and will adversely affect the quality of life for the residents of Boerum Hill.

Secondly; the study area of 400 feet is ridiculously inadequate — it must be at least half a mile in order to accurately study the impact on the neighborhood. The impact is in several different aspects — visual; practical (the impact on daily life of residents); educational : (the school will be capable of taking in more students; but the towers will bring many more families and students to the area; therefore there is no assurance that the school(s) in the area will be any less crowded. Many many more families will be brought into the area; therefore the result may well be that the school is more crowded than ever.

We, the residents of Boerum Hill; therefore declare themselves to be opposed to the erection of such a building in our neighborhood for both practical and aesthetic reasons. A tower like this must not be inserted into a landmarked 19th century neighborhood.

Sincerely;

Patricia Stegman Snyder  
245 Dean Street; Brooklyn NY 11217

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**From:** Jill Stempel <jill\_stempel@hotmail.com>  
**Sent:** Friday, July 28, 2017 12:06 PM  
**To:** Khalil Gibran 80 Flatbush  
**Cc:** rbearak@brooklynbp.nyc.gov; montgome@nysenate.gov; simonj@nyassembly.gov; slevin@council.nyc.gov  
**Subject:** MY public comment on the 80 Flatbush Environmental Impact Statement (EIS) scope of work

Ms. Jennifer Maldonado -

cc: Richard Bearak, Director of Land Use, Office of Eric Adams, Brooklyn Borough President  
cc: Velmanette Montgomery, State Senator  
cc: Jo Anne Simon, Assembly Member  
cc: Stephen Levin, City Council Member, District 33

As a 22 year resident of Brooklyn, a politically active Democratic voter, a Brooklyn home owner and the mother of 2 public school students in Brooklyn's district 13, I am writing to express my deep concerns regarding the granting of zoning exceptions to Alloy for the development of the two large buildings at 80 Flatbush.

First and foremost, I am extremely concerned about the issue of school overcrowding in this area. The proposal to add 922 new residential units will add an estimated 510 new public school students using the DOE's own formula. The 370 new school seats 80 Flatbush is offering still leaves a net negative of 140 school seats in an area where residents are facing overcrowding in their public schools already. Approximately 140 more school seats are required to support the students projected from 80 Flatbush alone and I do not see any plans to address this issue. Unless this is addressed, I do not think the zoning exceptions should be granted to this project.

I am also deeply concerned about the lack of financial transparency in the 80 Flatbush development process. Despite repeated requests from the public we have never seen a copy of the RFP that Alloy apparently "won" for this project and to my knowledge there has been no public budgetary analysis of the use of public funds to support the project, both via ECF tax-free bonds and other tax abatements or discounts. Could the same amount of tax payer dollars be applied directly to building/improving schools?

I have heard the CEO of Alloy speak at public meetings and refer to 80 Flatbush as a school construction project, but the school area of this project is only about 10-15% of the projected project and ignores the TWO GIANT COMMERCIAL SKYSCRAPERS that are being built around it! In order to build these giant buildings, I understand that Alloy must get Zoning exceptions. If that is the case then what are the justifications for these requests?

- o **Setback exception:** this is in place to require buildings to step back from the street at defined heights so light reaches the street and neighborhood. Eliminating this requirement is unjustified.
- o **Height exception:** this exists to honor the residential neighborhood and density. The lot is bordered by residential Boerum Hill and Fort Greene. It is not a part of downtown Brooklyn.
- o **FAR increase:** there is no economic justification provided in the EIS document for the 3x increase in FAR requested.

As a longtime neighborhood resident, I am also deeply concerned about the impact that adding this many units would have on the neighborhood and I would respectfully ask that the Environmental Impact Study area be increased from from 400 feet to 1 mile. 400 feet does not even reach the nearest subway station and I can tell you from experience that these trains are already overcrowded during the busy times of the day (rush hour, school let out times).

I also feel that the enormous scope of these buildings does not respect the rich history, density, and sensibility that is in sync with our residential, 4-story brownstone Brooklyn neighborhood and BAM cultural district. And as a resident of the Williamsburg Savings Bank building, I would ask that the committee consider the opportunity to preserve the site lines of this iconic, landmarked building from surrounding neighborhoods.

Thank you for listening to my concerns and I hope that I have made persuasive arguments to have you reconsider granting Alloy these zoning exceptions.

Please feel free to reach out to me directly if you have any questions regarding the issues that I have raised.

Best Regards, Jill Stempel

----- Forwarded message -----

From: Heather Taylor <hs.taylor3324@gmail.com>

To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>

Cc:

Bcc:

Date: Thu, 6 Jul 2017 10:42:00 +0000

Subject: Comments re: Draft Scope work for environmental impact study

Dear Ms. Maldonado,

Please enlarge the scoping area to at least one half mile rather than just 400 ft.

An extremely intense traffic study is essential for the corner of State St. and 3rd Ave. How will the elementary school buses line up on State St. twice a day? Will they have to extend the line-up further down State St. into the 400 block? How will this impact traffic both on State St. and at the already congested corner of 3rd. Ave.? How will the construction phase affect parking on State St., both in the 500 block and down further in the 400 and 300 blocks? How will regular pick up of garbage and street maintenance be impacted, especially in the 500 block of State St? How often will street closures on State St., Schermerhorn and on 3rd be necessary? How will everyday deliveries like postal, UPS, commercial and domestic be affected especially during build? How will the flow of traffic on the 400 and 300 blocks be affected as each phase is completed? Has the post office been notified of the proposed addition of 900 plus units in our zip code?

Compare the current response time of Fire engine 226 with the response time now, during construction, and then after build completion, especially including times when school buses are lined up in the morning and afternoon on State St.

Please include a pedestrian traffic and safety study at the very dangerous crossing at Flatbush and Lafayette. Also compare crossing at 3rd and State now and with the addition of new residents once build is completed.

Given that many retail units adjacent to 80 Flatbush, and to the north at the new "Hub" and on the next block of Atlantic have stood vacant for over four years, can this site support 40,000 square feet more of retail space? How will 40,000 sq. ft. affect market value for existing unrented retail space?

As we in the 400 block have already spent over three years with the construction noise of The Hub on Schermerhorn, a detailed noise study is essential. Include not only the noise from the build but demo of site, traffic noise of trucks to and from site, and will these vehicles be accessing site via State St.? Will such trucks as large cement trucks be lining up on State St.? Consider where construction workers will park, take breaks, eat lunch during build. This has added unwanted loitering on State St. with past construction.

Please study water run off both during build and after site is complete? How will 900 additional units affect the sewer system in the 500 and 400 blocks? As State Street's charm and environmental pluses rely on its trees and plants, a study by arborists of the shadow patterns as it applies directly to the existing trees in the 500 and 400 block is essential, including both on the street and in backyards. As many units in my building will be affected by glare (457 State St. eastern side of building is directly facing proposed build), include reflection from glass windows in the scoping study. The wind tunnel effect is already extreme at the corner of Flatbush and State, with the addition of 80 Flatbush's height, how will this add to wind? This is especially a problem across Flatbush in front of Atlantic Center, again extend the scoping area.

Thank you for your consideration of these issues,  
Heather Taylor  
457 State Street Apt. 1D

[hs.taylor3324@gmail.com](mailto:hs.taylor3324@gmail.com)

---

**From:** Meredith TenHoor <mtenhoor@pratt.edu>  
**Sent:** Monday, July 10, 2017 9:17 AM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 Flatbush Scoping

Dear Jennifer Maldonado,

I write to respond to the recent EIS for the 80 Flatbush development project.

First, I think the study are must be expanded to at least ½ mile. A building of this size will impact traffic, light, air quality, sewer load, and community facilities in a much larger area. It must include other concerns that are not listed: impact on wind, light reflection, pedestrian safety, public transit, parks, and other community facilities. Could you expand the EIS to include this? In a district with such high population density and so little park space, what is the impact of another tall building – in terms of light, pollution, and population, on one of the only local parks, 16 Sycamores?

Could the EIS also be expanded to consider school seats in the entire district? It is shocking to me that city-owned land that is so highly valued will yield us so few new seats given all the development that has occurred in Downtown Brooklyn. As a historian of architecture and urbanism who has studied the long history of rezoning in Downtown Brooklyn in my academic work, it is clear that our city often undervalues its resources, and gets too little return from commercial entities when resources are privatized. Khalil Gibran urgently needs better facilities, but the building in which it is located is so valuable that it should be possible to get more seats from expanded development. I think the EIS needs to take the potential availability of new school sites into consideration, as well. What is the impact of getting so few seats on one of the few developable parcels of land in the district?

Finally, the EIS should also include better study of the urban impact of this development. Why is massing situated along residential State Street, rather than at the corner of already-dense Schermerhorn and Flatbush? As far as I can tell from zoning maps, there is no as of right allowance for such tall building on State Street, and this plan should reflect this. The EIS needs to consider the impact of light, air, and property values on this block as well.

Thank you for your attention to this. I am sure that there is a way to get high quality facilities and affordable housing in our district without giving over so much public value to a private developer, even one with a record for quality projects such as Alloy.

Sincerely,

Meredith TenHoor  
Associate Professor and Undergraduate History-Theory Coordinator  
Pratt Institute School of Architecture  
200 Willoughby Ave. Brooklyn, NY 11205  
[mtenhoor@pratt.edu](mailto:mtenhoor@pratt.edu) or [m@mtenhoor.net](mailto:m@mtenhoor.net)

Founding Board Member, Aggregate Architectural History Collaborative  
[www.we-aggregate.org](http://www.we-aggregate.org)

Advisory Board Member, Temple Hoyne Buell for the Study of American Architecture, Columbia University  
[www.buellcenter.org](http://www.buellcenter.org)

----- Forwarded message -----

From: Danny Thomas <dannygthomas@gmail.com>

To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>

Cc:

Bcc:

Date: Fri, 28 Jul 2017 21:10:09 +0000

Subject: 80 Flatbush Project EIS...

July 28, 2017

Jennifer Maldonado, Executive Director  
New York City Educational Construction Fund  
30-30 Thomson Avenue, Fourth Floor  
Long Island City, NY 11101

Dear Ms. Maldonado:

My name is Danny G. Thomas. My wife Jane Nayagam-Thomas and I submit this response to the Scope of Work for the Environmental Impact Statement (“EIS”) for the 80 Flatbush Avenue project. The 80 Flatbush Project does not include any open spaces for the community around it.

The 80 Flatbush Project depicts green space on the roofs of the schools. These green spaces are small and do not appear to be accessible to the public. This presents a problem to the community around the proposed location of 80 Flatbush. The tallest building in Brooklyn would have green spaces that would only be enjoyed by the tenants of 80 Flatbush. That does not work for the Boerum Hill/Fort Greene community immediately affected by the building’s presence. The community will have already endured the burden of the building process, and now they would be asked to endure the burden of acknowledging green space but never having access to it. That is not right and unfair to the community. The community around the 80 Flatbush Project has a right to access the green space depicted in the plans, particularly because this community lacks green space.

Sincerely,

Danny G. Thomas & Jane Nayagam-Thomas

---

**From:** Cynthia Tindale <cynthiat@speakeasy.net>  
**Sent:** Monday, July 10, 2017 3:01 PM  
**To:** Khalil Gibran 80 Flatbush  
**Subject:** 80 Flatbush Draft Scoping Meeting for EIS--Comments

Hello Jennifer--

After attending the recent meeting--I appreciate the opportunity to submit the following comments & strong concerns for including in the EIS scope:

- EIS area must be increased to 1/2 mile-1/4 mile radius MINIMUM. 400 ft radius is simply not acceptable, as it does not include many key traffic arteries & buildings & stadiums bordering this project.
- The increased EIS radius should also take into account the additional large scale developments & their impacts--that are proposed & will be built prior to 80 Flatbush.  
These large scale developments & Barclays Center must be studied in conjunction with each other.
- EIS shadow study also needs to include all residential gardens on the north side of State Street, between Nevins & 3rd Ave. Only considering 16 Sycamores Park & the Baptist Temple on the adjacent block is not acceptable.
- EIS shadow study should also include the proposed building's wind, noise & reflective effects on the surrounding area.
- Street & pedestrian traffic should be studied during peak / rush hour / Barclays Center event times -- not during summer & school vacations (as they are being conducted now!)
- Emergency vehicle response time must be studied. The E226 Fire truck sits in gridlock traffic on State St & Nevins St trying to access Atlantic Ave & 3rd Ave ON A REGULAR BASIS NOW.
- EIS study must take into account pollution from idling trucks, buses & cars--already sitting in current gridlock on a regular basis now, as mentioned above.
- What are waste management & rodent abatement plans during demo & construction? This is an extremely serious health issue already in this area.
- What are the plans for Waste management going forward? I.e. compacting & underground storage of trash for all buildings? Disposal away from residential homes?
- Will adequate trash cans be provided & maintained on-site for workers DURING construction?
- Will construction times minimize impact on school age children & residents living in the area?  
Is it true all phases of construction will need to be done after school hours, due to KG students?!
- Appropriate attention to & consideration of scale & adjacency to Boerum Hill historic brownstone homes.  
Third Avenue & State Street portions of this footprint are RESIDENTIAL streets with residential neighbors & families.  
The extreme upzoning being requested & proposed development does not show this being considered.

Appreciate your help including these important neighborhood concerns in the Scope for the EIS.

Sincerely yours,

Cynthia Tindale  
State Street Resident

Sent from my iPhone

----- Forwarded message -----

From: Sean Toole <dianaandsean@gmail.com>

To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>

Cc:

Bcc:

Date: Sat, 29 Jul 2017 15:22:03 +0000

Subject: New development comments

Please see my public comment below

This development is located in Boerum Hill not downtown therefore the density is excessive. Locating the tallest tower in Brooklyn next to low-rise residential buildings is a violation of transitional zoning and design context.

The study area of 400-feet is inadequate to study all the indirect impacts, therefore a half-mile radius is needed.

For a more accurate and informed study, the EIS should include drawings and elevations of the No Action plan as well as a comparison elevation of heights of all buildings over 12-stories in the study area.

The development does not include any open space for the community. While green space is shown on the roofs of the schools, they are small and may not be accessible to the public.

Sincerely Diana Toole

167 Wyckoff Street

Sent from my iPhone

----- Forwarded message -----

From: Sean Toole <dianaandsean@gmail.com>

To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>

Cc:

Bcc:

Date: Sat, 29 Jul 2017 15:23:28 +0000

Subject: New development

Please see my comments below

This development is located in Boerum Hill not downtown therefore the density is excessive. Locating the tallest tower in Brooklyn next to low-rise residential buildings is a violation of transitional zoning and design context.

The study area of 400-feet is inadequate to study all the indirect impacts, therefore a half-mile radius is needed.

For a more accurate and informed study, the EIS should include drawings and elevations of the No Action plan as well as a comparison elevation of heights of all buildings over 12-stories in the study area.

The development does not include any open space for the community. While green space is shown on the roofs of the schools, they are small and may not be accessible to the public.

Sincerely

Sean Toole

166 Wyckoff Street

Sent from my iPhone

From: Jack Tretbar [mailto:[jacktretbar@gmail.com](mailto:jacktretbar@gmail.com)]  
Sent: Thursday, July 27, 2017 4:12 PM  
To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>  
Subject: Comments for 80 Flatbush EIS

Jennifer,

I'm a new homeowner, with my fiance, on the 400 block of State and I must say that I've been in a state of near constant dread since we were first told about the 80 Flatbush project.

We're by far the youngest owners on the block and only just recently moved from Manhattan so our perspective is certainly unique. Our last apartment was virtually right on top of the massive Hudson Yards project - super cranes and overloaded truck deliveries don't scare me... Inexperienced developers scheming against the taxpayers of this city, however, do scare the daylight out of me.

The study area must be extended. 400 feet is totally absurd and this community will not settle for less than a 1/2 mile study area.

Since the school cannot be disrupted, how will drilling be done so as not to disturb residents?

How will Engine 226, located just one block away, be affected?

State St. is a very small street that already faces congestion issues. How will staging on State St. affect the fire engine?

What will be the effect on Atlantic and Flatbush traffic? How will pedestrians be affected, especially the school children? We need a proper shadow study. Reflections from the building may be terribly oppressive. Where exactly will reflections land? The area already suffers from poor air quality due to being between major truck routes. How will the developer mitigate a further reduction in air quality?

The school seats being added will be offset entirely by the ~900 units of housing be built. How will this affect the local districts? How many seats will be taken by new residents of the tower?

Thank you for your time,  
Jack

---

----- Forwarded message -----

From: peter vadnai <[pvadnai@gmail.com](mailto:pvadnai@gmail.com)>

To: Khalil Gibran 80 Flatbush <[KhalilGibra80Flatbush@schools.nyc.gov](mailto:KhalilGibra80Flatbush@schools.nyc.gov)>

Cc: "[montgome@nysenate.gov](mailto:montgome@nysenate.gov)" <[montgome@nysenate.gov](mailto:montgome@nysenate.gov)>, "[simonj@nyassembly.gov](mailto:simonj@nyassembly.gov)" <[simonj@nyassembly.gov](mailto:simonj@nyassembly.gov)>, "[slevin@council.nyc.gov](mailto:slevin@council.nyc.gov)" <[slevin@council.nyc.gov](mailto:slevin@council.nyc.gov)>

Bcc:

Date: Wed, 19 Jul 2017 16:09:39 +0000

Subject: Alloy Project/80 Flatbush/ Brooklyn

Dear appointed and elected officials with the power to affect the quality of life in Brooklyn,

New York is perhaps the most international city in the world but at its heart is has always been a local city, a series of villages. This is especially true of Brooklyn. Brooklyn is defined by it's human scale. Brooklyn's neighborhoods have become iconic throughout the world. You folks are the peoples' shield in protecting the viability and sustainability of these neighborhoods.

The Brooklyn neighborhood currently under "siege" is the BAM Cultural District. This neighborhood is poised on a knife edge, balanced precariously between hyper-development and thoughtful urban planning. I believe that Jane Jacobs would not approve of the proposed development. Simply put; it is not appropriate. The design scale and density are not in sync with this neighborhood to say nothing of traffic congestion, infrastructure and student safety concerns.

Aside from the "soft" concerns of appropriateness and thoughtful urban planning there are the following "hard" concerns:

- The transfer / lease of city-owned land to the developer.
- The funding by the tax payers of tax-exempt bonds to pay for the school portion of the project.
- FAR increase to allow Alloy to build 112 total stories (across 2 towers) instead of the current maximum of 34 stories.
- The ability to build a 38-story tower straight up with no setback from the street.

As a resident of One Hanson Pl. I strongly urge you to consider well the interests of the residents both private, business and institutional when you make decisions that will potentially radically change life for the worse in Brooklyn. Brooklyn and its neighborhoods must remain distinct and avoid becoming cooky cutter, flavorless, franchise laden, inhuman and indistinct.

Thank you for your time.

Respectfully,  
Peter Vadnai  
One Hanson Pl.  
Brooklyn, NY

From: Irene Van Slyke <irene.vanslyke@verizon.net>

To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>

Cc:

Bcc:

Date: Sat, 8 Jul 2017 14:36:39 +0000

Subject: We need an extension on 80 Flatbush Ave

I live in Boerum Hill and agree with our elected officials that we need more time to contribute to the Scope of the EIS

Specifically

The study area needs to be expanded to one-half mile due to all the other residential construction recently completed or under construction now. We need to know how many people are being added to this area to fully comprehend the need for seats in school(s)

School system:

Will this proposal yield a net increase or decrease in the number of school seats currently needed either funded or unfunded?

What plan does DOE have to address the seating deficit? On what timetable?

Transportation:

What is the current capacity at specific subway stations or bus stops or traffic at specific intersections....whatever you'd like them to look at.

Architectural Character:

Is there any 50+ tower within 60 feet of a 4-story brownstone elsewhere in Brooklyn or would this be the first.

Does this proposal respect "transitional zoning" We worked very hard some 10 years ago to preserve the low rise brownstone area.

so what context criteria for design have a reference to brownstone Brooklyn.

Thank you for your consideration

Irene and Richard Van Slyke

206 Bergen Street

Brooklyn NY

----- Forwarded message -----

From: Lisa Vehrenkamp <[lisasregos@gmail.com](mailto:lisasregos@gmail.com)>

To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>

Cc:

Bcc:

Date: Thu, 27 Jul 2017 17:24:28 +0000

Subject: Concerns about 80 Flatbush Avenue project

Hello, I am a resident of One Hanson Place, across the street from the proposed development 80 Flatbush Avenue. I am writing to express concerns about the project.

First and foremost, the project that is proposed is too big. With a FAR of 18, it massively exceeds the FAR of 6 that is zoned. This might be fine in downtown brooklyn, or even a few blocks north where the forest of high rises has grown, but it really is too big for this site. It will tower over the brownstone neighborhood in Boerum Hill with loading docks etc on quiet state street. It will add to the overcrowding already seen on our roads, subways and green spaces. It will block the historic views of One Hanson Place, which has been seen all over Brooklyn for nearly 100 years. I am pleased to see the school development, but frankly a project of this size will take up all the seats in the new schools and we will be left exactly where we were before, but with an oversized development and 7 years of construction.

Please do the following:

Consider a MAXIMUM FAR of 12 - although we would prefer 6

Complete an impact statement of 1/2 mile around the site, the current one is inadequate

Analyze whether the building itself will take up all or most of the new school seats

Consider the complete lack of green space for residents (besides the school yards)

Reassess this site for a more relevant development!

Thank you,

Lisa Vehrenkamp

Launchpad Partners LLC

Propelling you to the next level

[www.launchpad-partners.com](http://www.launchpad-partners.com)

July 31, 2017

Ms. Jennifer Maldonado  
Educational Construction Fund  
30-30 Thomson Avenue, 4<sup>th</sup> Floor  
Long Island City, NY 11101

4 AUG 08 11:49

Re: Proposed towers to be built in Boerum Hill

Dear Ms. Maldonado,

Attached is the comment I emailed on Friday July 28 to the Khalil Gibran School address, prior to the deadline for comments from the Boerum Hill community, but it was unfortunately returned to me as undeliverable.

Please consider the attached comments regarding the proposed construction.

These comments were later cc'd to Councilman Steve Levin and to Dave Powell of the Fifth Avenue Committee.

Thank you.



Ditra Walsh  
354 State Street #3C  
Brooklyn, NY 11217

## Fw: Two massive towers planned for Boerum Hill

Ditra Walsh

Sun 7/30/2017 10:32 AM

roscadams@cityofnyc.gov <roscadams@cityofnyc.gov>; sievini@cityofnyc.com <sievini@cityofnyc.com>; Hamza Giron <hgiron@11thave.org>; Dave Powell <dpowell@11thave.org>; ditralist@hotmail.com <ditralist@hotmail.com>;

Dear all,

Here is an email I sent on Friday to protest the building of the two massive apartment towers at the end of State Street, Boerum Hill.

Thanks.

Ditra Walsh

Sent from [Outlook](#)

---

**From:** Ditra Walsh <ditralist@hotmail.com>  
**Sent:** Friday, July 28, 2017 5:34 PM  
**To:** khalilgibran80flatbush@schools.nyc.com; defilippispeter@aol.com; Ditra Walsh  
**Subject:** Two massive towers planned for Boerum Hill

I am writing to protest the two massive towers currently proposed for Boerum Hill.

I have lived in Boerum Hill since 1993. In past years I have enjoyed the diversity of the neighborhood, in terms of ethnicity, race, age, housing stock, commerce, funkiness, quaintness, the old Brooklyn that once existed. It was an affordable neighborhood until about 10 years ago, when suddenly the neighborhood was "discovered", for the very qualities I have listed above. Rents began to skyrocket. Predatory developers and investors moved in. Whole blocks were ripped apart. Commercial landlords could get higher rents so the traditional stores on Fulton Street and in the neighborhoods on either side of Flatbush and Atlantic were replaced by big box stores and high-end tenants, and residential landlords got tenants out either through outright eviction on illegal grounds or charging preferential rents, so they could very quickly take the apartments out of rent stabilization and double or in some cases triple rents. People who had lived in Boerum Hill and environs all their lives could no longer afford to live here. In my building on State Street there were 40 rent stabilized units when I moved in in 1993. There are now only 10 stabilized units, with the market rents ranging \$2400-3000 a month, for an old building with no elevator or doorman or resident super, built in 1920. That is what is happening to affordable housing in Boerum Hill. There is no affordable housing unless you are lucky enough to live in a rent stabilized apartment, and if you move, you won't find another such deal anywhere nearby. There is no real commitment by the Mayor or elected officials to increasing affordable housing in the city, and the deals developers have made in the past and are probably still making to provide affordable units in exchange for tax breaks are by no means replacing the affordable units that are being lost every day due to developer and investor predation on our neighborhoods.

A number of high rise apartment buildings have already been built in Boerum Hill, Cobble Hill, Downtown Brooklyn and Ft. Greene since then. Only 20% of units in some of these buildings are considered "affordable", but those units are almost impossible for tenants to get into. Meanwhile predation on Boerum Hill and surrounding neighborhoods continues. These neighborhoods are being destroyed by greed. The construction goes on night and day. It never stops. And the tenants or owners moving in have no idea of the history of this area and what has been destroyed.

I am adamantly opposed to even one more high rise in Boerum Hill. The developers are trying to sweeten the pot and get their predatory approvals by providing space for the Khalil Gibrán school and a 350 seat elementary school. I say both of these schools can find other locations. There are plenty of unused or underused buildings in downtown Brooklyn, some of which have already been turned into charter schools. The affordability, diversity, history and character of our remaining neighborhoods must be preserved, and we must hold the line against these developers.

Thank you for consideration of these comments.

Ditra Walsh  
354 State Street #3C  
Brooklyn, NY 11217

Sent from [Outlook](#)

### Undeliverable: Two massive towers planned for Boerum Hill

Microsoft Outlook <postmaster@outlook.com>

Sun 7/30/2017 5:35 PM

tkhailgibran80flatbush@schools.nyc.com <khailgibran80flatbush@schools.nyc.com>

#### Delivery has failed to these recipients or groups:

khailgibran80flatbush@schools.nyc.com (khailgibran80flatbush@schools.nyc.com)

Your message wasn't delivered. Despite repeated attempts to deliver your message, the recipient's email system refused to accept a connection from your email system.

Contact the recipient by some other means (by phone, for example) and ask them to tell their email admin that it appears that their email system is refusing connections from your email server. Give them the error details shown below. It's likely that the recipient's email admin is the only one who can fix this problem.

#### For Email Admins

No connection could be made because the target computer actively refused it. This usually results from trying to connect to a service that is inactive on the remote host - that is, one with no server application running. For more information and tips to fix this issue see this article: <http://go.microsoft.com/fwlink/?LinkId=389361>

#### Diagnostic information for administrators:

Generating server: BY2NAM05HT124.mail.protection.outlook.com  
Receiving server: BY2NAM05HT124.eop-nam05.prod.protection.outlook.com

khailgibran80flatbush@schools.nyc.com

7/30/2017 5:34:58 PM - Server at BY2NAM05HT124.eop-nam05.prod.protection.outlook.com returned '550 5.4.316 Message expired, connection refused(Socket error code 10061)'

7/30/2017 5:31:10 PM - Server at schools.nyc.com (13.92.140.101) returned '450 4.4.316 Connection refused [Message=Socket error code 10061] [LastAttemptedServerName=schools.nyc.com] [LastAttemptedIP=13.92.140.101:25] [CO1NAM05FT007.eop-nam05.prod.protection.outlook.com](Socket error code 10061)'

#### Original message headers:

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s=selector1; h=From:Date:Subject:Message-ID:Content-Type:MIME-Version;
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Jul 2017 17:34:26 +0000
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Frontend Transport/ Fri, 28 Jul 2017 17:34:27 +0000
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15.01.1282.023; Fri, 28 Jul 2017 17:34:27 +0000
From: Ditra Walsh <ditralist@hotmail.com>
To: "khailgibran80flatbush@schools.nyc.com"
<khailgibran80flatbush@schools.nyc.com>, "defilippispeter@aol.com"
<defilippispeter@aol.com>, Ditra Walsh <ditralist@hotmail.com>
Subject: Two massive towers planned for Boerum Hill
Thread-Topic: Two massive towers planned for Boerum Hill
Thread-Index: AQHT8881qyXXtN80Co2Hd1pms5LBA=
Date: Fri, 28 Jul 2017 17:34:27 +0000
Message-ID: <BN6PR10MB170020205610C806437ACB9EA78ED886PR10MB1700.namprd10.prod.outlook.com>
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X-MS-Exchange-Correlator:
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x-tmn: [voWjK3k9tNlHq4BuUo0S5hLrgEh0wFZ]
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x-eopattributedmessage: 0
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x-forefront-prva: 03827AF76f
spendiagnosticsoutput: 1:90
spendiagnosticsmetadata: NSPM

```

----- Forwarded message -----

From: joan weihe <wejm042001@yahoo.com>

To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>

Cc: "hkolins@aol.com" <hkolins@aol.com>, "cb2K@nyc.it.com" <cb2K@nyc.it.com>, "ywcabklynta@gmail.com" <ywcabklynta@gmail.com>

Bcc:

Date: Fri, 7 Jul 2017 19:45:32 +0000

Subject: 80 Flatbush Avenue- No Towers Over Brownstone Brooklyn

Name:Joan Weihe

Address: YWCA 30 Third Avenue - 4H

Brooklyn, NY 11217

E-Mail: wejm042001@yahoo.com

Comments:

As a resident of the YWCA on Third Avenue, this project presents a number of problems. There is continual 24-hour traffic on Third Avenue. It is hard to image how additional traffic from cars, school buses,delivery trucks, let alone a docking space, could be accommodated.

Due to this condition of traffic on Third Avenue and Flatbush Avenue, a problem of safety for school children presents itself to me. This project is not a place for 2 schools.

Looking down Third Avenue, the buildings present a continuous line in range with each other. No buildings of 38 and 74 stories loom over the others dominating the landscape.

The disruption to the lives of those in the area would be enormous due to the noise from long range construction, narrow streets, releasing of vermin, overcrowded transportation, lack of adequate shopping,and safety issues for everyone.

The lack of school accommodations should be considered for everyone. Obviously, this is a large problem and these needs should be met in a better way.

Development doesn't necessarily need to produce a change in the character of the neighborhood. We do not consider ourselves to be part of Downtown Brooklyn, but a Brownstone community.

In my opinion, this project is not suitable for the location that has been chosen. More consideration should be given to the community at large.

----- Forwarded message -----

From: Mark Williams <[Mark.Williams@sundance.tv](mailto:Mark.Williams@sundance.tv)>

To: Khalil Gibran 80 Flatbush <[KhalilGibran80Flatbush@schools.nyc.gov](mailto:KhalilGibran80Flatbush@schools.nyc.gov)>

Cc:

Bcc:

Date: Wed, 26 Jul 2017 18:24:18 +0000

Subject: 80 Flatbush EIS Scoping

Attn: Jennifer Maldonado, Executive Director

As a 16 year resident and property owner on State Street I am utterly outraged by the attempts to construct the grossly oversized buildings at 80 Flatbush. Below are a few of many reasons this development will be stopped:

- This development is located in Boerum Hill not downtown therefore the density is excessive.
- Locating the tallest tower in Brooklyn next to low-rise residential buildings is a violation of transitional zoning and design context.
- The study area of 400-feet is inadequate to study all the indirect impacts, therefore a half-mile radius is needed.
- For a more accurate and informed study, the EIS should include drawings and elevations of the No Action plan as well as a comparison elevation of heights of all buildings over 12-stories in the study area.
- The development does not include any open space for the community. While green space is shown on the roofs of the schools, they are small and may not be accessible to the public.

As a member of the Boerum Hill Association and the 400 State Street Block Association I wholeheartedly welcome the schools and the affordable housing but NOT if it overwhelms our neighborhood and destroys the fabric of this community.

Sincerely,

Mark Williams

--

Mark H. Williams

SVP Brand Creative

SundanceTV

11 Penn Plaza, 21 floor

New York, NY 10001

[212-324-8560](tel:212-324-8560)

[mark.williams@sundance.tv](mailto:mark.williams@sundance.tv)

----- Forwarded message -----

From: Karen Zebulon <zebulonk@earthlink.net>

To: Khalil Gibran 80 Flatbush <KhalilGibran80Flatbush@schools.nyc.gov>

Cc:

Bcc:

Date: Fri, 28 Jul 2017 23:08:07 +0000

Subject: 80 Flatbush Development

I am a long-term Boerum Hill/Ft. Greene resident and 16-year business owner on Atlantic Avenue.

I know the community and it's residents very, very well.

A development of this magnitude far exceeds the proper height for a brownstone community.

Our neighborhoods should be preserved, landmarks preserved, quality of life preserved, along with respect for the people who have made these neighborhoods their home for decades.

There has to be limits set. Developers are only out for their interest and the return on their investment. Already the high rises in the area are having difficulty filling their apartments. Why do we need more and especially a building of such enormity.

I also strongly feel that that location, with the heavy traffic, is not safe for an expanded school. It is not a safe location for children to be coming and going on a daily basis. It is an extremely dangerous location.

These factors only touch on the many reasons why this project should not be approved.

I strongly oppose this development!

Karen Zebulon

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**From:** Matt Zimmer <mrz73@verizon.net>  
**Sent:** Sunday, July 09, 2017 8:35 PM  
**To:** Khalil Gibran 80 Flatbush  
**Cc:** ojonas@nysenate.gov  
**Subject:** Comments on the Draft Scope of Work

Jennifer Maldonado, Executive Director  
New York City Educational Construction Fund  
30-30 Thompson Avenue, 4th Floor  
Long Island City, New York, 11101

cc: Oscar Jonas, community liaison for State Senator Velmanette Montgomery

Dear Ms. Maldonado,

Thank you for taking the time to consider the sincere concerns of the community surrounding the proposed 80 Flatbush project. While I understand the need to add new school seats, I am deeply troubled by many aspects of the proposed project. I hope that the time will be taken to carefully study the many questions raised by a project of this scale. The potential number of new school seats would be small relative to the number of new apartments and the net effect is likely to make the overall crowding and lack of public school seats worse not better. This hardly seems like a tradeoff that would justify the many negative consequences that would result from granting the discretionary approvals necessary for the development to proceed as planned.

Unlike the previous towers that have so far been constructed in the downtown Brooklyn business district this would be a massive development with one of its main entrances as well as the only parking access on a narrow low-rise brownstone street. The phase one tower would also go up directly in front of the Williamsburgh Savings Bank, one the most recognizable landmarks in Brooklyn. The 1977 landmark designation cited the building's prominence in the Brooklyn skyline, and Marty Markowitz when explaining his approval for 300 Ashland said that that new building would preserve the "iconic respect" for the Williamsburgh Savings Bank. This proposal would be the first to breach this 90 year old precedent.

We've already seen something similar with the Pierhouse development in Dumbo. For years the community was given assurances that the luxury development would not alter the views of the Brooklyn Bridge from the promenade. However, despite those assurances the building indeed was built at a height that mars the unobstructed views of the bridge that had always been enjoyed. So before we allow taxpayer subsidies for another development we should be assured that the same thing won't happen here in our neighborhood.

As for the draft scope of work proposal for the Environmental Impact Statement some specific questions that should be answered include:

- Why is the proposed study area only 400 feet? That seems inadequate to accurately assess all the potential impacts. It seems an area of at least one-half mile would be the bare minimum to encompass all the affected areas.

- There's discussion of a shadow study, what about a study of the wind and reflection effects from these towers?

- What are the plans for allowing the school to continue to operate during construction? And would those same mitigation steps mean that the impact on the surrounding neighborhood would be greater? For example, working late at night instead of working when school would be in session.

- What would the ramifications be for the fire department on State St from having multiple years of construction blocking that narrow street?

- What about the lack of green space for the schools and consequently the added stress this development would put on the existing surrounding green spaces?

- What would an "as of right" building look like? Wouldn't the smaller size of such a building be more in keeping with the surrounding area?

I'd also like to mention the concern that the developer Alloy has never built anything at a scale to what is being proposed here. Given all of the potential pitfalls and the already saturated market what risk is there that we end up with a project brought forward because of government incentives that nevertheless fails because of poor execution and a slowdown in the increasingly crowded real estate market?

So respectfully, I offer my objection to the development as proposed, and trust that as the analysis moves forward that our responsible city representatives and stewards will find the will to resist the request for new zoning rules that risk such irreparable harm to the historic character of brownstone Brooklyn. Thanks again for your time.

Best regards,  
Matt Zimmer

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