

October 31, 2017

Robert Dobruskin
New York City Department of City Planning
120 Broadway
New York, NY 10271

Re: CEQR Ref Number #18DCP034K
Industry City Rezoning

Brooklyn Community Board 7 has reviewed the above titled Draft Scope of Work for the rezoning of Industry City. We understand that the Project Actions detailed in the Draft Scope of Work will enable renovation of 5.3 million square feet of existing structures and construction of approximately 1.27 million sf of new structures, for a total of 6.57 million square feet of new commercial, retail, office, event, academic and hotel spaces, spread throughout the 19 buildings comprising the Industry City campus, affecting nearly 1.5 million of lot area, or 32.75 acres.

The Project Description also states that over 25,000 daily visitors will patronize the site's commercial destination retail and commercial components, in addition to nearly 13,000 new employees of its businesses.

A project of this size has the potential to significantly change the Sunset Park and Greenwood Heights neighborhoods, in particular, its commercial and industrial businesses and employment base, as well as indirect effects on the existing residential population in the area. Community Board 7 welcomes this new investment in a long underutilized asset in the community. While championing this investment, the Board's responsibility is to ensure that new development takes into account community needs and concerns.

The following comments incorporate input from the members of Community Board 7 and represent our interpretation of the Draft Scope of Work submitted for public review. We reserve the right of amend and revise our comments as the land use review process continues, and look forward to the Applicant's official presentation before the Board after the rezoning is certified.

Sincerely,

Dan Murphy
Chair
Brooklyn Community Board 7

John Fontillas
Land Use/Landmarks Committee Chair
Brooklyn Community Board 7

Brooklyn Community Board 7 Comments on the
Draft Scope of Work for an Environmental Impact Statement for Industry City
220 36th Street, Brooklyn, New York

1. Purpose and Need for the Proposed Action

- a. As the Proposed Action will require a series of discretionary approvals from city agencies, the Scope of Work should include a clear point by point explanation of how the Proposed Action supports or differs from the New Connections/New Opportunities: Sunset Park 197-a Plan, a community based planning initiative first started by Brooklyn Community Board 7 in 1993, and approved by the City Council in December 2009.

2. Description of the Proposed Actions

- a. Please provide analysis of why the Proposed Actions are the minimum change necessary to achieve the stated goals. What other zoning alternatives were considered and why were those alternatives not pursued?

3. Analysis Framework

- a. The Reasonable Worst Case Development Scenario depicted in the Draft Scope of Work assumes retention of existing warehouse buildings, either in the Density-Development Scenario or Overbuild Scenario. Were any scenarios assuming the demolition of an existing warehouse building lot or site, either in part or whole, considered as part of a development scenario. If not, why not? What would be the impact in terms of buildable zoning area if such a scenario were considered?

4. Land Use, Zoning and Public Policy

- a. The Proposed Project describes a “large scale development”, as defined by the NYC Zoning Resolution. Per the CEQR Technical Manual “large scale, high density development” should include a primary study area whose general boundary “reflects the actual context of the area”. Essential to this definition is the area’s land use development history, commute patterns, and interrelationship of residential districts to employment along the waterfront. Historically, Sunset Park owes its built land use context to early developers advertising residential housing located within walking distance of jobs in the industrial waterfront area. This “walk to work” convenience motivated residential development of areas directly east and south of the Project Site, which was further bolstered by construction of the 4th Avenue Subway line in the 1910’s. Neighborhood commercial businesses developed along 5th Avenue to provide shopping for residents. As such, the general boundaries of the neighborhood should extend to 5th Avenue upland of the sites, and include the 5th Avenue business district, between 36th Street and 44th Street, whose businesses would be affected by activities at the site.
- b. The Scope of Work should address the Proposed Action’s relationship and coordination with the following community based and city planning initiatives:
 - i. Vision 2020 Comprehensive Waterfront Plan – DCP

- ii. Sunset Park Waterfront Vision Plan – NYC EDC
 - iii. NYCDEP Green Infrastructure Plan
 - iv. PlaNYC – DCP
 - v. DOT 10 year Capital Plan
 - vi. Vision Plan for 4th Ave Corridor – BBPO
 - vii. Brooklyn Waterfront Greenway (BGI/DOT)
 - viii. NYC Special Initiative for Rebuilding and Resiliency
 - ix. South Brooklyn Marine Terminal
 - x. Citiwide Ferry Service
 - xi. Brooklyn Queens Streetcar
 - xii. M1 Hotel Zoning
 - xiii. Made in NY Campus at Bush Terminal – NYC EDC
- c. How does the Proposed Action take into account CB7's Statements of District Needs and Budget Priorities?
 - d. Please list all other federal, state or city planning initiatives, procedures and/or studies within 1 mile of the project site that may have an effect on the project's impact.

5. Socioeconomic Conditions

- a. The Proposed Project states that potential employment of 13,000 on-site jobs will be implemented by full build-out, a significant increase from the 1,900 jobs present at the site in 2013. Per the CEQR Manual, this would be substantial new development different in character from existing uses, development and activity within the neighborhood. Adjacent to the Project Site, increasing rents and market rate development have been occurring, creating conditions of involuntary displacement of residents resulting from changes in socioeconomic conditions. The Proposed Actions meet the threshold evaluation steps with regard to substantial new populations with different incomes within the neighborhood, with a potential to affect real estate market conditions, and readily observable rent trends and risks of displacement of a vulnerable population. A detailed analysis should be undertaken to assess indirect residential displacement and indirect business displacement within expanded primary and secondary study areas.
- b. The Proposed Project describes the inclusion of over 500,000 sf of new Local Retail commercial space, in addition to 387,728 of Destination Retail commercial space. Since this is a significant increase in the amount retail commercial space within the local trade area and could create indirect business displacement, the Scope of Work should include analysis of the impact on neighborhood commercial businesses within 3 miles of the project site.
- c. Describe how DCP's interagency partners will support workforce training programs proposed at Industry City.

6. Community Facilities and Services

- a. The EAS stated that the project would not require analysis of the effect on Community Facilities. The Proposed Project, however, will bring a sizable new population into the

area causing increased demand for existing services. In particular, the effect of the Proposed Project on police/fire services and health care facilities should be documented.

- b. Multiple school facilities are located within the study area adjacent to the Proposed Project. Given the new population projected to be traveling and patronizing the site, the effect of increased traffic to and from the site near school sites should be examined – see comments on Transportation below.

7. Open Space

- a. The Proposed Project forecasts a significant increase in office and business employees at the Project Site. The site occupies an underserved area of Brooklyn relative to open space, parkland, and access to the waterfront. The Scope of Work should consider qualitative factors regarding the potential for new open space, public parks, upland connectors, public access links to the waterfront.

8. Urban Design and Visual Resources

- a. Due to the Project Site's location at the foot of the Brooklyn terminal moraine, new structures built within the Project Site will directly affect viewsheds from upland parks and open spaces, such as Green-Wood Cemetery and Sunset Park, two the highest elevations in Brooklyn. In particular, a 9/11 Memorial Grove was located within Sunset Park with views to Lower Manhattan. The Scope of Work should include an in-depth analysis that ensures that views to and from these sites, which have been historically valued by the community, are protected from intrusion and visual blight.
- b. Provide photo simulations showing the two development scenarios from vantage points upland from the Project, along the Gowanus Expressway, and from offshore locations in Upper New York Bay. Emphasis on potential signage, rooftop structures and bulkheads, overhead power lines and interbuilding connections, and fenestration patterns on new structures and overbuilds should be delineated.
- c. The Scope of Work should include development of the Project Site to implement the Brooklyn Waterfront Greenway, upland streetscape connectors and other urban design initiatives such as Brooklyn 4th Avenue Great Streets project.

9. Water and Sewer Infrastructure

- a. The Scope of Work should include a calculation of water demand of proposed new uses at the Project Site. Typically, large buildings use 20 gallons of water per square foot on average, potentially requiring a significant new demand on site for supply.
- b. The Scope of Work should include an analysis of increased sanitary and sewer flows and their effects through existing drainage facility infrastructure, in particular nearby CSO outfalls located at Bush Terminal Park.

10. Solid Waste and Sanitation Services

- a. The Scope of Work should include exploration of methods to reduce solid waste generation.

- b. The Scope of Work should analyze the effect of truck traffic and commercial hauling activities along the 3rd Avenue corridor.

11. Energy

- a. The proposed project forecasts renovation of approximately 5.7M sf of commercial, retail, office, event and academic space in existing buildings, much of which is currently not tempered or climate controlled. The Scope of Work should analyze how the projected energy use required to climate control these areas will affect existing power transmission within the nearby neighborhood area.
- b. Provide an analysis of how the Proposed Action reflects existing city policies regarding energy efficiency, reduced emission in new buildings, and construction in flood hazard areas.

12. Transportation

- a. The Scope of Work should provide an in-depth analysis of traffic impacts to and from the site. Truck traffic for deliveries and waste hauling should receive particular consideration given their significant effects on adjacent neighborhoods and limited access points for delivery.
- b. Several high-risk intersections are adjacent to the Project Site, as documented from recent pedestrian fatalities near the Project Site. The Scope of Work should review traffic counts within an expanded area up to 5th Avenue and down to 45th Street to include pedestrian commute patterns from transit nodes. The Scope of Work should also take into account weekend and seasonal retail traffic given the influx of patrons projected by the project on these days.
- c. In addition to counts showing exiting off the Gowanus headed towards the Project Site, the analysis should extend to how patrons will return to the highway system given the nearest on ramps are located at 65th Street and Hamilton Avenue by the Brooklyn Battery Tunnel.
- d. Describe how the Proposed Actions will be affected by or improve the physical and environmental condition of the Gowanus Expressway/Third Ave Corridor, which the complex faces. In particular, how will pedestrian access across the street be accomplished given that the majority of transit options are located on 4th and 5th Avenues.
- e. The current 36th Street subway station is currently not accessible to the disabled. Provide an analysis of how disabled patrons will reach the Project Site and how the project will provide ADA compliance.
- f. Provide analysis of potential parking impacts adjacent to the Project Site, and how the existing parking lot areas underneath the Gowanus Expressway will be impacted, both in terms of turnover, vehicular and pedestrian access, and proposed safety improvements, if any.

13. Air Quality

- a. It has been documented in several recent studies that the Gowanus Expressway is a significant threat to public health, with high rates of asthma, emphysema and other respiratory diseases reported in children and adults in Sunset Park. The Scope of Work must analyze potential effects on air quality from increased vehicular and truck traffic to the Project Site.

14. Greenhouse Gas Emissions

- a. Provide an analysis how the Project Site will reduce building energy use and resultant greenhouse gas emissions.
- b. The Scope of Work should document the Proposed Project's potential of green roof, tree planting, open space and energy efficient mechanical equipment.

15. Noise

- a. Provide analysis of noise impact from increased truck traffic to and from the site.
- b. Due to Sunset Park and Greenwood Heights' topography, location of rooftop mechanical units on top of the proposed project buildings will create noise effects that will be carried towards upland residential districts. Provide analysis of potential receptors up to one half mile from the site.

16. Public Health

- a. Do the Proposed Actions coordinate with city policies on community wellness issues, such as the FRESH program?

17. Neighborhood Character

- a. Assessment of the Proposed Actions effects on neighborhood character should be included in the Scope of Work. Although the Proposed Actions may have moderate to significant impacts on land use, socioeconomic conditions, historic and cultural resources, urban design, and transportation, taken together, these impacts in combination will cause significant change to a neighborhood characterized by a diverse, working class population.

18. Construction

- a. The Proposed Scope of Work should assess impact on existing School facilities, transit and drop off zones near the site by material deliveries, noise and other construction activities.
- b. The Scope of Work should include proposed measures to reduce air pollutant sources related to demolition and construction activities, including a Construction Health and Safety Plan.