



THE CITY OF NEW YORK
MANHATTAN COMMUNITY BOARD 3
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Alysha Lewis-Coleman, Board Chair

Susan Stetzer, District Manager

June 21st, 2018

Marisa Lago, Director
New York City Department of City Planning
120 Broadway
31st Floor
New York, NY 10271

Re: Two Bridges LSRD Minor Modifications Public Review Period

Dear Director Lago:

Community Board 3 (CB 3), our local elected officials, and the Two Bridges community have been working on and preparing for the Two Bridges LSRD minor modifications since late 2016. Although these are technically minor modifications, the three proposals represent a very significant change that will radically alter our community for the future.

To give a picture of the Two Bridges area today, there are approximately 7,457 residents living in the census tract where the projects are being proposed. Twenty-one percent are over the age of 65 and 37 percent of those over 65 live in poverty. Approximately 75 percent are people of color and close to 40 percent are foreign born. Thirty-one percent of residents here live in poverty. CB 3 as a whole has the second highest income diversity ratio—the gap between our low income and highest income residents—in New York City. The proposed addition of 2,775 housing units will certainly make this neighborhood one of the highest in income diversity gaps—if not the highest—in the City. This picture of Two Bridges shows a very vulnerable and underserved community for whom the proposed actions will have great detrimental consequences.

It is necessary and an obligation to allow the community being impacted and the offices serving the community to thoroughly review the current minor modification applications and the proposed actions' projected environmental impacts. There is generally a 45-day review period for community comments on a minor modification. However, there is also generally an ongoing communication between DCP, applicants, and the community board to be aware of the status of an application and to prepare for the review of documents, which may require the hiring of expertise that the community board and community does not have. After over a year of silence, the community board very unexpectedly received a call on Monday, June 18th stating that the application would be delivered (as a courtesy!) after 5:00 pm on Tuesday, June 19th and that the application would be referred out for review on Monday, June 25th, which would start a 60-day period for comments (DCP has extended the comment period from 45 to 60 days). In addition, the community board and constituents will be tasked with reviewing and preparing comments on the projects' Draft Environmental Impact Statement (DEIS) during the same time period.

When these projects were first presented in late-2016, and continuing through 2017, there was ongoing community outreach and dialogue with CB 3. For some reason, this stopped completely and there had been no indication that this application was nearing completion. The timing of this is at the worst possible moment in the year for a community board. All agencies are aware that community boards do not meet in August, and all agencies always work to coordinate around this. Referring this project out suddenly, at a time that makes public review and comment extremely difficult to coordinate, would establish a troubling sense of mistrust between agencies and community.

With the public review period beginning on Monday, June 25th, the full community board vote on the applications would have to take place on Tuesday, July 24th, since the next opportunity would be in September, outside the 60-day comment period. That means the Land Use Committee must meet before that, and at this late date the only day we have available is Monday, July 16th.

Since we now have the applications, we have 17 working days to prepare to comment on them before the committee presentation and vote. We anticipate receiving the DEIS on Friday, June 22nd, which will need to be reviewed simultaneously and presents the additional challenge of analyzing several hundred pages of technical material in even fewer working days.

Given the current timeline, sufficient and robust public review of this project—which will alter the character and demographics of the Two Bridges community forever—is not possible, nor respectful to the community. As a majority community of color with a large immigrant population, aging residents, and a growing gap between the highest and lowest income households, Two Bridges deserves better. Therefore, CB 3 requests that DCP work with the board and the community by extending the period for the application review at least until the last week in September—the next opportunity for the full board to meet and vote.

Sincerely,



Alysha Lewis-Coleman, Chair, Community Board 3



MyPhuong Chung, Chair – Land Use, Zoning, Public & Private Housing, Community Board 3