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Testimony for Draft Generic Environmental Impact Statement (DGEIS) for the Seward Park Mixed-Use Development Project.

My name is Dominic Pisciotta and I am the Chairperson for Community Board 3, Manhattan. We are very excited to be at this important step in considering the future of the "Seward Park Extension Urban Renewal Area" (SPURA) and hope to continue leveraging the consensus we developed in the form of a set of Guidelines for SPURA in January of 2011. The road we have taken over the last few years to get to this evening has been one of compromise and inclusion of disparate view points from both key community stakeholders and individual members of the public.

I commend the effort of the City's Economic Development Corporation and Housing Preservation and Development for participating in and providing a facilitator throughout the last year and a half as well as for including many aspects of the Community Board 3 Guidelines in the Draft Scope of Work for the General Environmental Impact Study. However, as will be heard this evening there are substantive omissions in the scope that do not include or match up to key guidelines passed by Community Board 3 on January 25, 2011 in a unanimous vote, not to mention the only successful vote in over 40 years of multiple failed attempts to obtain a consensus.

My testimony focuses on incongruencies between the scope and the Guidelines. While some comments appear to be differences of word choice, the scope's language in these instances misinterprets the intent of the Guidelines or wholly negates to mention them. It is important to see a strong effort made by the City to study and recognize what was put forth in the Guidelines as written, in continued recognition of the historic compromise struck by a diverse set of stakeholders.

Recommendations for Changes in the Scope

On Page 4, *2011 Community Board 3 Planning Guidelines*, last paragraph: remove "broad" from this sentence since the guidelines were not intended to be "broad" in the sense that their core intent was not to be strongly considered part of the GEIS.

Page 6, *Site Plan, Urban Design, and Sustainability Considerations*, first paragraph, first sentence: replace "approximately" with "no less than," as specified in the CB 3 Guidelines.

Page 6, *Site Plan, Urban Design, and Sustainability Considerations*, third paragraph: There should be mention of the Guidelines call for a primary or intermediate school and a senior living facility.

Page 7, *D. Framework for Environmental Review—Reasonable Worst-Case Development Scenario*, first paragraph, third sentence: Should say "at least 60 percent of the floor area ratio" instead of "approximately 60 percent...."

Page 8, *D. Framework for Environmental Review—Reasonable Worst-Case Development Scenario*, second paragraph, first sentence: should say "up to 1000 dwelling units, of which half would be affordable units, consisting of what is described in the CB 3 Guidelines"

Page 8, *D. Framework for Environmental Review—Reasonable Worst-Case Development Scenario*, second paragraph, second to last sentence: should say, "non-specific commercial uses could become community facility uses, such as a primary and/or secondary school, as described in the CB 3 Guidelines."

Page 11, Task 2, 3rd bullet, first sentence: how is the "list of future development projects in the study area" ascertained? The firm should source local media for near-future projects.

Page 12, Task 4, general: There is no inclusion of senior facilities, which are part of the CB 3 Guidelines. Both the impact or benefits of senior facilities as well as the increase in senior service needs should be studied.

Page 12, Task 4, first bullet: It should be recognized that the study area covers two school districts, with the majority of the new development being in District 2, but on the border with and overlapping District 1. Keeping in mind that there has been deficient planning for new school construction in the Department of Education's District 2 and Community District 1, special and critical research needs to be invested that goes beyond the DOE or School Construction Authority's numbers and analysis. If we do not critically analyze the need for a new primary and intermediate school now with such a large development, there is the potential for exacerbating the overcrowding in District 2 and placing District 1 in the same situation District 2 is in today, especially when considering that other large developments in the scope's study area could accompany or follow soon after SPURA. There could be changes to the boundaries of the districts, so looking alternatively at the surrounding schools' capacity less as District 1 and District 2

and more in an aggregate may be more appropriate in truly understanding the impact of the SPURA development to the surrounding area.

Additional resources and tools for accomplishing Task 4 should come from 1) The American Community Survey, 2) The Downtown Alliance collects data for Community Board 1 /District 2, which would help provide information on poor planning and overcrowding in D2, 3) many news accounts of the poor planning of DOE in an area with booming residential construction, and 4) Community Board 1's staff put together a comprehensive Power Point helping both lay and policy makers interpret and plan for school needs. The latter document will be submitted via email and/or upon request. The Community Education Councils for District 1 and District 2 need to be interviewed as well to gather additional quantitative information.

The study area's schools' capacity should be measured using the following data from the DOE and/or elsewhere, along with the CEQR estimate of .12 elementary seats/apartment :

- School enrollment history by gender for 2006-2010 should be studied to see trends.
- Table of zones where each child comes from, to see what kids are zoned elsewhere (= out of district in D1, and applies to D2)
- Number of younger siblings in future classes. Many schools now use this data but DOE may not.
- Data on births in district

Analyze factors and trends that cause enrollment to increase or decrease:

- Request recent year data for births—for example Community Board 1 birth yield is up 46% in 4 years. The yield is determined by using the equation: Total number of current children/Total number of births 5 yrs earlier = Birth Yield
- Look at number of first child births. For CB 1, the percentage of first births is still very high, meaning more siblings to come is going to increase crowding.
- New construction
- Public vs Private vs Charter school choices
- Housing vacancy rate

Page 12, Task 4, first bullet, last sentence: suggest modifying sentence to read, "...of the project and planned projects within the impact area relative to available..."

Pages 17-20, Task 13: Overall, there is no inclusion of bicycles as a mode of transportation. Wherever there is a mention of "vehicle, mass transit, and pedestrian traffic," bicycles should be included in the analyses just as is done in the last bullet of the Vehicle/Pedestrian Safety Assessment section on page 20. Bicycle routes should be studied. Similarly, bicycle count data should be obtained from the DOT, especially with the Williamsburg Bridge feeder arteries comprising the boundaries of the development.

Page 20, Task 13, *Parking* section: The Bloomberg Administration is planning to promote bike sharing and the Williamsburg Bridge is a primary artery for cyclists commuting into Manhattan. Along with vehicle parking, there should be an analysis of current bicycle parking amenities, future projections of bike route usage in the study area, and the benefits of providing bicycle lockers/parking near the transit hubs in the study area.

Page 23, Task 16, *Noise*: If "attenuation" does not specifically address sound canyons created by new developments and affecting those developments or existing ones in the study area, then this type of noise mitigation needs to be analyzed.

Page 24, Task 19, first paragraph, last sentence and the Transportation Systems bullet: Include studying how bicycle traffic circulation will be affected along with vehicle and pedestrian traffic.

Page 26, Task 21: Should this not be "Tasks 2-19" instead of "2-18?" Include the inclusion of the study area with the existing downtown Borough Construction Command Center to assist with addressing and resolving problems between agencies in a coordinated manner.

Appendix: Considering there are references throughout to the Community Board 3 Guidelines, they should be included in an appendix for reference by the firm conducting the study. It is important for the firm to officially receive and acknowledge these Guidelines in whole so that they understand their intent.

In conclusion, I appreciate your time and interest in redeveloping SPURA and strongly urge the City to incorporate all of these recommendations into the GEIS.

Thank you,



Dominic Pisciotta
Community Board 3, Manhattan, Chairperson